

James Hadley
July 13, 2017

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

MILORAD RAICEVIC	§	
	§	
Plaintiff	§	
	§	
Versus	§	CIVIL ACTION 3:15-cv-327
	§	
WOOD GROUP PSN, INC.,	§	
ET AL.	§	
	§	
Defendants	§	

ORAL AND VIDEOTAPED DEPOSITION OF
JAMES HADLEY
JULY 13, 2017

ORAL AND VIDEOTAPED DEPOSITION OF JAMES
HADLEY, produced as a witness at the instance of the
Defendant and duly sworn, was taken in the above styled
and numbered cause on Thursday, July 13, 2017, from
10:21 a.m. to 2:48 p.m., before Rene White Moarefi, CSR,
CRR, RPR in and for the State of Texas, reported by
computerized stenotype machine, at the offices of Donato
Minx Brown, PC, 3200 Southwest Freeway, Suite 2300,
Houston, Texas, pursuant to the Federal Rules of Civil
Procedure and any provisions stated on the record
herein.

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A P P E A R A N C E S

FOR THE PLAINTIFF:

JOHN D. SHEPPARD, ESQ.
MORROW & SHEPPARD, LLP
3701 Kirby Drive, Suite 840
Houston, Texas 77098
Tel: 713.489.1206
jsheppard@morrowsheppard.com

FOR THE DEFENDANT FIELDWOOD ENERGY, LLC:

RYAN L. MARLATT, ESQ.
DONATO, MINX, BROWN & POOL, P.C.
3200 Southwest Freeway, Suite 2300
Houston, Texas 77027
Tel: 713.877.1112 Fax: 713.877.1138
rmarlatt@donatominxbrown.com

FOR THE DEFENDANT WOOD GROUP PSN, INC.:

BRIGID D. ASHCRAFT, ESQ.
JOHNSON DELUCA, KENNEDY & KURISKY
1221 Lamar, Suite 1000
Houston, Texas 77010
Tel: 713.652.2525 Fax: 713.652.5130
bashcraft@jdkglaw.com

FOR THE DEFENDANT SHAMROCK MANAGEMENT, LLC:

BRIAN HILLEND AHL, ESQ.
GALLOWAY, JOHNSON, TOMPKINS, BURR & SMITH
1301 McKinney, Suite 1400
Houston, Texas 77010
Tel: 713.599.0700 Fax: 713.599.0777
bhillendahl@gallowayjohnson.com

FOR THE DEFENDANT ISLAND OPERATING COMPANY, LLC

HAL J. BROUSSARD, ESQ.
BROUSSARD & KAY, LLC
909 Garber Road
Broussard, Louisiana 70518
Tel: 337.232.1666
hal@bandkay.com

Also Present:

MR. ERIC FONTENOT
MR. BRANDON ROJAN - VIDEOGRAPHER

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1 THE VIDEOGRAPHER: Going on record
2 10:21 a.m., Thursday, July 13th, 2017, beginning the
3 deposition of James Hadley.

4 Will counsel please state their appearance
5 for the record.

6 MR. J. SHEPPARD: John Sheppard for the
7 plaintiff.

8 MR. MARLATT: Ryan Marlatt for Fieldwood.

9 MR. BROUSSARD: Hal Broussard for Island
10 Operating.

11 MS. ASHCRAFT: Brigid Ashcraft for Wood
12 Group.

13 MR. BROUSSARD: Branch Sheppard will be
14 appearing for Shamrock, and he's on his way. He got held
15 up.

16 MR. J. SHEPPARD: And my understanding is he
17 told Ms. Ashcraft for us to get started?

18 MS. ASHCRAFT: That's correct.

19 MR. J. SHEPPARD: Okay.

20 MR. BROUSSARD: Yes, he said to get started.

21 MR. J. SHEPPARD: Okay.

22 (Witness sworn.)

23 MR. J. SHEPPARD: Do you want something
24 about objections?

25 MS. ASHCRAFT: You have the mike.

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1 MR. BROUSSARD: There's an agreement, I
2 believe, with plaintiff counsel that if one objection is
3 made by one defendant, that objection will be good for
4 all.

5 MR. J. SHEPPARD: Correct.

6 JAMES HADLEY,
7 having been duly sworn, testified as follows:

8 EXAMINATION

9 BY MR. J. SHEPPARD:

10 Q. Okay. Would you please state your name for the
11 record.

12 A. James Hadley.

13 Q. What's your middle name?

14 A. Monroe.

15 Q. M-o-n-r-o-e?

16 A. Uh-huh.

17 Q. What's your date of birth?

18 A. 7-28-74.

19 Q. And I can already tell you're speaking really
20 softly, and if you could speak up a little bit more not
21 just for the court reporter but so everyone in the room
22 can hear you.

23 A. Okay.

24 Q. Have you ever given a deposition before?

25 A. No, sir.

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1 Q. My name's John Sheppard, and I represent the
2 plaintiff, Milorad Raicevic, in this case. Do you
3 understand that?

4 A. Yes, sir.

5 Q. Do you know who Milorad Raicevic is?

6 A. Yes, sir.

7 Q. A few ground rules, I call them, to help this
8 process go smoothly, if you don't mind, okay?

9 A. Okay.

10 Q. One is to please wait until I'm finished asking
11 my question before you give an answer so that the court
12 reporter can keep a nice clean record without us talking
13 over one another, fair?

14 A. Yes, sir.

15 Q. I'll warn in you advance I'm kind of a slow
16 talker, so you're going to find yourself waiting for me to
17 finish before you give your answer, okay?

18 A. Okay.

19 Q. And I'll try to do the same for you.

20 A. I'm hard of hearing in this ear, so --

21 Q. Okay.

22 A. -- if I ask you to repeat, that's -- that's why.

23 Q. And that's exactly what I want you to do. If you
24 don't hear me or if you don't understand me, I don't want
25 you to answer the question or even try to. I want you to,

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1 instead, tell me that you didn't hear me or you didn't
2 understand me, okay?

3 A. Yes, sir.

4 Q. So if you do answer my question, it's fair for us
5 to assume that you heard me and that you understood me,
6 right?

7 A. Yes, sir.

8 Q. Yes, sir?

9 A. Yes, sir.

10 Q. Okay. And we're doing an okay job right now, but
11 it's important for us to use words as opposed to only
12 nodding our head up and down. Again, this is being
13 written down, and we're going to want to be able to read
14 it later.

15 A. Yes, sir.

16 Q. Are you under any medication today that would
17 inhibit your ability to give full and accurate testimony?

18 A. No, sir.

19 Q. If you need to take a break at any time, let me
20 know, and we'll take a break. I want you to be
21 comfortable. With one exception, if I've asked you a
22 question, you got to answer the question first before we
23 take a break, okay?

24 A. Yes, sir.

25 Q. What's your home address?

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1 A. 21218 Osage Street, Lockhart, Alabama.

2 Q. 2121 and then what was the next part?

3 A. 8.

4 Q. The number 8?

5 A. Yes, sir, the number 8.

6 Q. Osage Street.

7 A. Osage, O-s-a-g-e, Street.

8 Q. Birmingham, Alabama?

9 A. Lockhart, Alabama.

10 Q. I don't know where I came up with Birmingham,
11 but . . .

12 What's the zip?

13 A. 36455.

14 Q. How long have you lived there?

15 A. Five years.

16 Q. Where did you live before that?

17 A. They've changed the -- the addresses. We got a
18 911 address now, so it's different. I can give you my --
19 the old address, but it ain't gonna pull it up --

20 Q. Sure.

21 A. -- on, like, Google Map or whatever.

22 Q. What's the old address?

23 A. It's 308 Highway 54 West, Florala, Alabama.

24 Q. How do you spell that city?

25 A. F-l-o-r-a-l-a, Alabama.

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1 Q. And what's the zip?

2 A. 3 -- 364 -- 36442.

3 Q. Did you live there before Lockhart?

4 A. Yes, sir.

5 Q. For how long did you live in this other city?

6 A. Pretty much my entire life, but not at that
7 location. I lived there 11, 12 years.

8 Q. Are you married?

9 A. Yes, sir.

10 Q. What's your wife's name?

11 A. Joanna Hadley.

12 Q. What's her maiden name?

13 A. Joanna Holley.

14 Q. H-o-l-l-e-y?

15 A. Yes, sir.

16 Q. Do you have any children?

17 A. Yes, sir.

18 Q. What are their ages?

19 A. 15 -- 16 and 20.

20 Q. What's the 20-year-old's name?

21 A. Christian Kyle Hadley.

22 Q. K-y-l-e?

23 A. Yes, sir.

24 Q. Where does he live?

25 A. With me.

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1 Q. At your house?

2 A. Yes, sir.

3 Q. Did Fieldwood ask you to be here today?

4 A. Yes, sir.

5 Q. You're an employee of Fieldwood?

6 A. Yes, sir.

7 Q. If they ask you to come to the trial, will you
8 come to trial?

9 A. Yes, sir.

10 Q. Any plans to come to Houston in the future?

11 A. No, sir.

12 Q. Unless -- unless Fieldwood asks you to?

13 A. Unless they ask me to.

14 Q. Okay. You are still an employee of Fieldwood?

15 A. Yes, sir.

16 Q. Tell me a little bit about your educational
17 background. Did you graduate high school?

18 A. No, sir.

19 Q. Did you attend high school?

20 A. Yes, sir.

21 Q. Where did you attend high school?

22 A. Florala High School, Pensacola Tate is the name
23 of the second high school, and then Pensacola Junior
24 College is where I finished up with my G.E.D. and six
25 months of college. I found out I didn't want to be a

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1 college guy.

2 Q. So got the G.E.D. from Pensacola Junior College
3 and then did six months of college?

4 A. Well, it was part of the -- yes, sir, part of the
5 program of your G.E.D., it was part of that, the six
6 months.

7 Q. How did you decide to get into that program?

8 A. I don't even remember how or why. I just ended
9 up -- I know I was there and had to do it to get a job,
10 for one thing.

11 Q. Did you get any -- in addition to the G.E.D. --
12 I'm going to shift to past G.E.D., past high school -- did
13 you complete any certificates or educational benchmarks at
14 the junior college or any other school?

15 A. No, sir.

16 Q. No college degree?

17 A. No, sir.

18 Q. Did you go to work after that six months?

19 A. Yes, sir.

20 Q. Where did you go to work?

21 A. First, I was logging in -- for -- Alabama Swamp
22 Loggers is the name of the company. I worked there -- I
23 was 17.

24 Q. What did you do for Alabama Swamp Loggers?

25 A. Run equipment.

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1 Q. What type of equipment?

2 A. Skidders and cutters and chainsaws.

3 Q. What kind of business is that?

4 A. A logging business.

5 Q. Cutting down trees?

6 A. Cutting down trees.

7 Q. And you would operate those pieces of
8 equipment --

9 A. Yeah.

10 Q. -- you just --

11 A. Yes.

12 Q. -- identified?

13 A. Yes, sir.

14 Q. Did you get any --

15 MS. ASHCRAFT: Sorry, Mr. Hadley, would you
16 mind speaking up just a little bit. I'm having a tough
17 time hearing you. I apologize.

18 THE WITNESS: I'll try my best.

19 MR. J. SHEPPARD: And let me -- are -- are
20 we picking up the audio? Okay.

21 Q. (BY MR. J. SHEPPARD) Because you have a
22 microphone on you, and so we're recording it that way, but
23 then the people in the room -- you're a very soft talker.

24 A. I have a -- it's like a -- whatever it is,
25 it's -- when I go to talk, it will squeak, so I don't --

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1 that's why I don't try to talk loud. It just started,
2 like, two days ago, I guess, because I'm nervous for --
3 for the deposition, I don't know.

4 MS. ASHCRAFT: It happens to me.

5 Q. (BY MR. J. SHEPPARD) So this squeak when you
6 talk loud, that's not a persistent --

7 A. No.

8 Q. -- medical condition --

9 A. No.

10 Q. -- that you have --

11 A. No, no --

12 Q. -- going on?

13 A. -- no, sir. It's allergies, I guess.

14 Q. And you said you're hard of hearing in your left
15 ear. How did that come about?

16 A. Water -- skiing accident -- incident on the
17 water. I busted my eardrum years ago, and it's just . . .

18 Q. Recreational skiing?

19 A. Yes, sir.

20 Q. What are you --

21 A. Water -- water skiing.

22 Q. Okay.

23 A. Yes, sir.

24 Q. When was that?

25 A. I don't know what the year was. I was 15, 16

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1 years old.

2 Q. And I asked you your birthday, but I didn't write
3 it down. How old are you now?

4 A. Forty -- I'll be 43 the 28th of this month.

5 Q. Did I ask --

6 A. Yeah.

7 Q. -- what is your birth date?

8 A. Yeah, you did. You wrote it down.

9 Q. No, I didn't write it down.

10 A. 7-28-74.

11 Q. Okay. Thank you for telling me again.

12 How long did you work for Alabama Swamp
13 Loggers?

14 A. About a year, maybe a year and a half.

15 Q. The left ear condition, have you seen a doctor
16 about that?

17 A. No, not -- not pertaining to just that, no, sir.

18 Q. Are you legally deaf in your left ear?

19 A. I'm not deaf in it. I just -- it's -- it's
20 weaker than the right one, so sometimes you'll see me put
21 my hand up there like that, so . . .

22 Q. To kind of try to --

23 A. Yeah, I can hear out of it.

24 THE REPORTER: Please wait.

25 THE WITNESS: Oh, I'm sorry.

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1 Q. (BY MR. J. SHEPPARD) Yeah, you're starting to
2 know where I'm going with my questions --

3 A. I'm sorry.

4 Q. -- and answer before I finish.

5 I think you said you have not seen -- you're
6 not seeing a doctor for your ear condition?

7 A. No, sir.

8 Q. When's the last time you saw a doctor for your
9 ear condition?

10 A. Probably 1992.

11 Q. Have you been rated with any sort of disability
12 or deafness for your ear?

13 A. No, sir.

14 Q. Okay. Have you ever used hearing aids or
15 anything like that?

16 A. No, sir.

17 Q. When's the last time you had your hearing tested?

18 A. Last year with Fieldwood.

19 Q. How did you do?

20 A. That's what -- that's when I found out how
21 different it was. I mean, I passed it, but . . .

22 MS. ASHCRAFT: Branch wants to participate
23 by phone.

24 MR. J. SHEPPARD: Okay. We're going to --
25 there's a lawyer that is going to call in, and so we're

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1 going to take a brief pause, if everyone's okay with that,
2 and get him on the speakerphone.

3 THE VIDEOGRAPHER: Going off the record,
4 10:33 a.m.

5 (Short recess.)

6 THE VIDEOGRAPHER: Going on record, 10:44.

7 Q. (BY MR. J. SHEPPARD) Mr. Hadley, are you ready
8 to proceed?

9 A. Yes, sir.

10 Q. What did you do after working for Alabama Swamp
11 Loggers?

12 A. That's -- I went to work for Universal Ogden
13 catering company.

14 Q. What did you do for them?

15 A. Galley hand.

16 Q. What does Universal Ogden do?

17 A. Catering company.

18 Q. Where is it based?

19 A. New Orleans, Louisiana.

20 Q. Where did you work out of?

21 A. Out of -- Virgin Islands was two weeks and then
22 out of Mobil for a week.

23 Q. Was it a cruise company?

24 A. No.

25 Q. Did you only work for them for three weeks?

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1 A. It was 14 and 14 and then 14 and 7. It was an
2 offshore company. I took care of drilling rig catering.

3 Q. Okay. How long did you work for Universal Ogden?

4 A. Six months.

5 Q. Then what did you do?

6 A. Transferred to outside working for the -- the
7 oil -- or the drilling company for Zapata drilling.

8 Q. Z-a-p-a-t-a?

9 A. I believe so.

10 Q. What did you do for them?

11 A. Roustabout.

12 Q. Where did you work?

13 A. I didn't understand.

14 Q. Gulf of Mexico?

15 A. Yes, sir. Yes, sir, Gulf of Mexico.

16 (Whereupon Mr. Brian Hillendahl joins the
17 proceedings.)

18 Q. (BY MR. J. SHEPPARD) How long did you work for
19 Zapata?

20 A. I'm not exactly sure. About three and a half,
21 four years.

22 Q. And then where did you go work?

23 A. Fab-Con.

24 Q. Fab-Con?

25 A. Yes, sir.

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1 Q. What'd you do for them?

2 A. We worked offshore in production field doing
3 construction work.

4 Q. What did you do for them?

5 A. Roustabout/rigger.

6 Q. How long did you do work for them?

7 A. A year and a half.

8 Q. Then what did you do?

9 A. Went to work for Island Operating.

10 Q. What did you do for them?

11 A. Production operator.

12 Q. Production what?

13 A. Production operator.

14 Q. How long did you work for them?

15 A. 11 years.

16 Q. What were the dates, approximate?

17 A. 2000 to 2011. I'm sorry, 13 years, because it
18 was 2013.

19 Q. So does that mean that you worked for them for 13
20 years?

21 A. Yes, sir, I'm sorry.

22 Q. Working in the Gulf of Mexico?

23 A. Yes, sir.

24 Q. And then where did you go?

25 A. Apache.

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1 Q. What did you do for them?

2 A. PIC.

3 Q. Which stands for person in charge?

4 A. Yes, sir.

5 Q. Working in the Gulf of Mexico?

6 A. Yes, sir.

7 Q. When did you leave Apache?

8 A. We -- '14, I think -- no, I don't -- I don't know
9 the exact dates. It was a rollover or whatever.

10 Q. What's -- how did you characterize it when
11 Apache's platforms transitioned to Fieldwood? Was it a
12 sale?

13 A. That's what I -- I -- I was told it was a
14 rollover-type deal, you know. I don't know terminology
15 of -- of what they call it.

16 Q. The word you use is rollover?

17 A. Everything just kind of rolled over, you know,
18 all the personnel was the same, equipment was the same.

19 Q. You kept the title PIC, person in charge, at
20 Fieldwood?

21 A. Yes, sir.

22 Q. Is that still your title at Fieldwood?

23 A. Yes, sir.

24 Q. When did you first start working on the Mp 153
25 platform?

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1 A. The first time I worked on it was in ninety --
2 '98.

3 Q. Do you still work on that platform?

4 A. Yes -- yes, sir, now. The whole time I wasn't on
5 that location. I worked on it for a couple of hitches in
6 construction, and that was it. Then we moved -- I moved
7 back 2000 something. I mean, it's not my -- it wasn't my
8 permanent location back then is what I'm saying.

9 Q. Okay. So you first worked on it when you were at
10 Fab-Con?

11 A. Yes, sir.

12 Q. Did you work on it when you were at Zapata?

13 A. No, sir.

14 Q. So at Fab-Con is when you first worked on the Mp
15 153?

16 A. Yes, sir.

17 Q. Am I saying the name of the platform right,
18 Mp 153?

19 A. B -- add a B to it. I'm sorry.

20 Q. Add a B to it? Okay.

21 A. Yes, sir.

22 Q. And the questions I was asking about the Mp 153,
23 you were answering that as if I had said Mp 153 B?

24 A. Yes. Well, we have a -- it used to be a dual
25 designation. One five -- 153 is the dual designation --

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1 Q. Uh-huh.

2 A. -- back in the Shell days they said, so that's
3 why I took it for granted. Sorry.

4 Q. Dual designation for what two things?

5 A. Sorry?

6 Q. What does the dual -- what does dual designation
7 mean?

8 A. It's used to be South Pass 65 Field --

9 Q. Uh-huh.

10 A. -- and then you had 153 --

11 Q. Uh-huh.

12 A. -- B and C in it, so it was South Pass 65/153, so
13 that's what . . .

14 Q. The platform where Mr. Raicevic was working on
15 December 1st, 2014, is the Mp 153 B?

16 A. Yes, sir.

17 Q. The first time you worked on that platform was at
18 Fab-Con in and around 1998?

19 A. Yes, sir.

20 Q. Going forward in this deposition, I'm just going
21 to refer to the Mp 153 B as the platform.

22 A. Okay.

23 Q. And if I ever talk about a different platform,
24 like the 65 A or some other, we'll -- we'll make that
25 clear.

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1 A. Yes, sir.

2 Q. Because it's hard for me to keep saying Mp 153 B.

3 A. I gotcha. Yes, sir.

4 Q. When did the platform become your permanent
5 location?

6 A. 2004.

7 Q. Okay. And how does it work? Are you assigned
8 exclusively to the -- the platform or do you work in other
9 areas as well?

10 A. I've worked in other areas as well, I mean . . .

11 Q. But since 2004, the platform has been within your
12 responsibilities as the P -- as the PIC?

13 A. Yes, sir.

14 Q. And to this day, it's still a platform that you
15 have PIC responsibilities over?

16 A. Yes, sir.

17 Q. Okay. Since 2004 to the present, how much of
18 your time do you spend at the Mp 153 B platform?

19 A. Can you -- I didn't understand that.

20 Q. So I'm going to try to get -- I'm trying to
21 understand how much time you spend at the Mp 153 platform
22 versus other platforms. For example, if you were to tell
23 me I spend 99 percent of my time at the Mp 153 and I only
24 occasionally go to other platforms, I want to know that,
25 or if it's half and half or if it's a third. I want to

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1 try to get the best approximation of what it is.

2 So the question is: Since 2004 to the
3 present, how much of your time do you spend at the
4 Mp 153 B versus other platforms?

5 A. Probably about 95 percent of the time I was at
6 153 B.

7 Q. And that's generally true from 2004 to the
8 present?

9 A. Yes, sir.

10 Q. Tell me about your shift work. How does it work?
11 Two weeks on, one week off, one month on, one month off?

12 A. Two weeks on, two weeks off.

13 Q. Has it always been that way since 2004?

14 A. No, sir.

15 Q. When did it change?

16 A. I couldn't tell you. I mean, I don't remember
17 the dates and all that.

18 Q. Has it changed many times?

19 A. Yes, sir.

20 Q. Various years, various months --

21 A. Yes, sir.

22 Q. -- it might have a different cycle?

23 A. Yes, sir.

24 Q. In December of 2014, what was the cycle?

25 A. 14 and 14.

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1 Q. And let me expand it a little bit more from
2 December 2014. From the summer of 2014 until the spring
3 of 2015 -- are you with me?

4 A. Uh-huh.

5 Q. What was your work cycle?

6 A. As far as I can remember, 14 and 14.

7 Q. Today, is it 14 and 14?

8 A. Yes, sir.

9 Q. All right. What is your understanding as to the
10 job responsibilities of a PIC?

11 A. Can you repeat that again?

12 Q. What is your understanding as to the job
13 responsibilities of a PIC?

14 A. Do you want me to tell you the -- all the
15 responsibilities that I have?

16 Q. Yes.

17 A. I'm in charge of the entire platform, everything
18 that goes on, anything that happens.

19 Q. You're responsible for everything that happens at
20 the platform?

21 A. As far as -- yes, sir.

22 Q. Who do you report to?

23 A. My field foreman, Ronnie Bonin.

24 Q. Is that also referred to as a production foreman?

25 A. Yes, sir.

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1 Q. Can you spell his name?

2 A. R-o-n-n-i-n -- Ronnie -- Ronnie Bonin is
3 R-o-n-n-i-e and then Bonin is B-o-n-i-n.

4 Q. All right. Okay. How long has he been the
5 production foreman at Fieldwood?

6 A. I'm not sure how long he's worked for Fieldwood,
7 but I know he's worked in our field for -- since 2013.

8 Q. You've reported to him since 2013?

9 A. Yes, sir.

10 Q. Do you know who he reports to?

11 A. Yes, sir. Reggie Quinn.

12 Q. Is that the area foreman?

13 A. Yes, sir.

14 Q. Is Reggie in Lafayette?

15 A. Yes, sir.

16 Q. Do you ever report to Reggie Quinn?

17 A. Yes, sir.

18 Q. How do you know whether to report to Ronnie
19 versus Reggie?

20 A. If for some reason you can't get Ronnie, you
21 know, in a reasonable time, you can report to Reggie, or
22 if Ronnie's out of pocket and he's -- you know, he's at a
23 facility that don't have communication, you report to
24 Reggie.

25 Q. If the issue is important enough, do you

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1 sometimes report to both of them?

2 A. Yes, sir.

3 Q. Nothing wrong with that?

4 A. No, sir.

5 Q. As the PIC, do you agree that you are responsible
6 for the overall safety of the platform?

7 A. Yes, sir.

8 Q. As the PIC, do you agree that it is your
9 responsibility to hold daily safety meetings?

10 A. Yes, sir.

11 Q. As the PIC of the platform, is it your
12 understanding that you're responsible for making sure that
13 JSAs are done properly?

14 A. Yes, sir.

15 Q. And a JSA is different than a safety meeting,
16 correct?

17 A. Yes, sir.

18 Q. You're supposed to have a safety meeting every
19 day, right?

20 A. Yes, sir.

21 Q. And you're also supposed to do a safety meeting
22 once a week, correct?

23 A. Yes, sir.

24 Q. Those are documented on forms, right?

25 A. The weekly is; yes, sir.

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1 Q. Is the daily safety meeting documented on a form?

2 A. Not -- not unless it's a tail -- it's just a
3 tailgate meeting, it's not. If it's a -- major work, you
4 know, it is.

5 Q. Do you know whether or not Fieldwood's policies
6 and procedures say that daily safety meetings should be
7 documented on a specific form every day?

8 A. I -- I'm -- I'm familiar with it, but I couldn't
9 repeat it word for word. I know where to go to find the
10 information you're asking, but I haven't read it in the
11 last week or two, so . . .

12 Q. Let's -- let's take a back -- a step back,
13 because I don't need you to memorize it. Is it your
14 understanding that it is Fieldwood's policy that the daily
15 safety meeting needs to be documented in writing every
16 day?

17 A. Yes, yes, I --

18 Q. Do you document your daily safety meeting every
19 day in writing?

20 A. Yes, sir.

21 Q. Okay. So for every day in November and
22 December 2014, there should be a documented safety
23 meeting, correct?

24 A. I can't answer that, because I don't -- I can't
25 remember if we even had that policy at the time. Our

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1 policies changed.

2 Q. If --

3 A. Company changed.

4 Q. Okay. Do you remember the policy about daily
5 safety meetings being documented in writing ever changing?

6 A. Yes, with -- not with this company, but from
7 company to company, it has changed.

8 Q. I mean, from at your time at Apache and
9 Fieldwood --

10 A. Uh-huh.

11 Q. -- do you ever remember being told that the
12 policy regarding daily safety meetings being documented in
13 writing changing?

14 A. No. No, sir.

15 Q. To this day, are you documenting your daily
16 safety meetings in writing every day?

17 A. If you have a daily safety meeting, yes.

18 Q. Are you having daily safety meetings every day
19 today?

20 A. We have daily tailgate meetings.

21 Q. Is that different than a safety meeting?

22 A. Yes, sir.

23 Q. Okay. So my question is: Are you having daily
24 safety meetings every day?

25 A. No, sir.

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1 Q. All right. Back in November and December 2014,
2 were you having daily safety meetings?

3 A. No, sir.

4 Q. How did you decide whether or not to have a daily
5 safety meeting versus just a tailgate meeting?

6 A. In our JSAs and all that, that's our daily
7 safety -- what do you call -- can you repeat that, please?

8 Q. Back in November and December 2014, how did you
9 decide whether or not to have a daily safety meeting that
10 you documented in writing versus a tailgating meeting?

11 A. I didn't decide that.

12 Q. Who did decide that?

13 A. I don't -- I don't understand your question
14 really --

15 Q. Okay.

16 A. -- as far as --

17 Q. Let's back --

18 A. -- I mean --

19 Q. Let me try to unpack it and see if we can
20 understand it.

21 A. The safety meetings that we have -- and we have a
22 morning meeting. It's not called a morning safety meeting
23 every day.

24 Q. Uh-huh.

25 A. We have a safety meeting every Sunday that is

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1 documented. If we have a safety meeting daily, we
2 document it. If not, if it's just a morning discussion,
3 it's not a meeting -- you know, it's not a safety meeting,
4 we don't document it.

5 I didn't make that rule or regulation or
6 whatever you want to call it, but that's just -- I mean,
7 if we have a morning safety meeting, we document it.

8 Q. And that's my question.

9 A. Yeah.

10 Q. How do you decide whether or not to have a
11 morning safety meeting versus just a regular meeting?

12 A. Okay. If we have more -- more than one or two
13 things going on, you know, if hazards change or if you got
14 a hazard, we -- we have a morning safety meeting, or if
15 they tell us to have a meeting over this incident or
16 whatever, you know. I don't make determinations of what's
17 what, I mean --

18 Q. Who does decide --

19 A. -- we have a morning meeting.

20 Q. Sorry, I thought you were finished.

21 A. No, sir.

22 Q. Who does decide whether or not to have a morning
23 safety meeting as opposed to just an ordinary meeting?

24 A. I think you're -- you're misunderstanding or
25 either I'm misunderstanding the question.

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1 Q. Sometimes you have morning safety meetings?

2 A. Yes, sir.

3 Q. Who makes that decision when you have those?

4 A. The company.

5 Q. Which company?

6 A. Fieldwood.

7 Q. Who tells you, I want you to have a morning
8 safety meeting today?

9 A. I don't understand what you're -- what you're
10 meaning other than we get up and we have a morning
11 meeting.

12 Q. Uh-huh.

13 A. We -- we don't document it.

14 Q. Uh-huh.

15 A. We get up. We have 30 people. They're doing two
16 different jobs. We have a safety meeting, we have a JSA
17 walk-through, we have a tailgate meeting, it's all
18 documented. But if there's just us, we're not doing
19 nothing out of the ordinary, we have a tailgate meeting.
20 That's -- that's it. I don't make no determination of --
21 I don't make no regulations. I don't do any of that.

22 Q. I understand. I'm trying to find out who decides
23 whether or not you do more than just the tailgate meeting.
24 And on those days where you have safety meetings --

25 A. I guess it would be me --

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1 Q. Okay.

2 A. -- I'm sorry.

3 Q. That's your decision whether or not to have a --

4 A. Yes, sir.

5 Q. -- safety meeting on a day-to-day basis?

6 A. I guess so, yes, sir.

7 Q. And so if a safety meeting is not performed on a
8 specific day, that's your decision?

9 A. Yes, sir.

10 Q. You do have weekly safety meetings?

11 A. Yes, sir.

12 Q. And you testified that you hold those on Sundays?

13 A. Yes, sir.

14 Q. So back in November and December 2014, we should
15 be able to find weekly safety meeting reports for those
16 Sunday meetings, correct?

17 A. Yes, sir.

18 Q. You fill out those forms, right?

19 A. Not all the time, sir.

20 Q. Sometimes other people fill them out?

21 A. Yes, sir.

22 Q. Do you always participate in the weekly safety
23 meetings?

24 A. If I'm -- yes, sir.

25 Q. You paused. Do you sometimes miss those?

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1 A. No, sir, I -- what I was saying is if I'm
2 presenting the safety meeting, I fill them out. We have a
3 lead operator that presents them. We try to train on
4 safety meetings, that's all. That's all I was pausing
5 for.

6 Q. Okay. Has there ever been a spill of oil from
7 the Mp 153 into any waters of the Gulf of Mexico?

8 A. I'm sure there has been, yes, sir.

9 Q. And so let me narrow it down. Since your time on
10 the platform, has that ever happened?

11 A. Yes, sir.

12 Q. And when that happens, you're required to fill
13 out spill forms, correct?

14 A. Yes, sir.

15 Q. Have you done that?

16 A. Yes, sir.

17 Q. So those exist for the spills that you're
18 referring to, there should be spill forms documenting that
19 it happened?

20 A. Yes, sir.

21 Q. And in addition to that, the spill must be
22 reported to the State of Louisiana, correct?

23 A. Yes, sir.

24 Q. Have you done that?

25 A. Not -- I'm not the one that reports them to -- I

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1 report them -- our policy, we go to our spill reporting
2 procedure, and that's -- I follow it.

3 Q. What's the procedure? Who do you report spills
4 into the Gulf of Mexico to?

5 A. I report to my foreman, and he -- either to -- to
6 Reggie Quinn, and it goes up from there.

7 Q. Do you know how quickly a spill into the Gulf of
8 Mexico has to be reported to the State of Louisiana?

9 A. Yes, sir. I -- I just can't think of it right
10 now. I could -- I can go to it on the computer and show
11 you, I mean . . .

12 Q. What's your best understanding without looking it
13 up on the computer?

14 A. Within two hours.

15 Q. Okay. When's the last spill from the Mp 153 B
16 into the Gulf of Mexico that you remember occurring?

17 A. It's been -- I think we had one in 2015 --

18 Q. Okay.

19 A. -- I think.

20 Q. Uh-huh.

21 A. A leaking fitting or something had dripped and --

22 MS. ASHCRAFT: A leaking what?

23 THE WITNESS: Fitting, off of a tubing
24 fitting.

25 Q. (BY MR. J. SHEPPARD) Where was that tubing that

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1 was leaking?

2 A. It was off of the emergency generator diesel
3 line, I believe.

4 Q. So we should be able to find a report if this
5 happened?

6 A. Yeah, it should be -- it may not be that year. I
7 mean, like I said, it's been -- I don't remember a whole
8 lot as far as that spill or when the last spill was. I
9 don't remember the dates and all, I mean . . . I don't
10 have it in my computer up here.

11 Q. Besides an injury to someone, is there anything
12 more important or serious than a spill or a leak into the
13 Gulf of Mexico?

14 A. Can you repeat that?

15 Q. Besides an injury -- well, let me ask you this.

16 Do you agree that safety is the No. 1
17 priority at all times at the platform?

18 A. Yes, sir, safety -- safety is the No. 1 utmost
19 thing that I preach especially.

20 Q. Do you agree that if there is a safer way to do
21 something, that that way must be followed?

22 A. Repeat that again now.

23 Q. Do you agree that if there is a safer way to do
24 something, then the safer way must be followed?

25 A. Yeah, I guess so. Yes, sir.

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1 Q. Do you agree that the business of Fieldwood can
2 never be put ahead of the safety of its employees?

3 A. The safety is first, utmost first. Safety
4 compliance production is how I run my business. If you
5 don't have safety, you ain't gonna have compliance, you
6 ain't gonna have production.

7 Q. So set aside injuries to people. Let me -- let
8 me start my question over.

9 Besides an injury to an employee, which is
10 the -- the worst thing that -- that can happen, is there
11 anything more serious than a spill into the Gulf of
12 Mexico?

13 A. If somebody gets hurt, then the spill's right up
14 there with it. I mean, you don't want to put oil in the
15 water.

16 Q. All right. Does -- what if even one drop of oil
17 falls into the Gulf, does that have to be reported?

18 A. You report it.

19 Q. It doesn't matter how small it is?

20 A. No.

21 Q. What if it's mist --

22 A. You report it.

23 Q. -- creating a sheen?

24 A. You report it.

25 Q. What if it's mist and it's not creating a sheen?

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1 A. You report it. Everybody reports it.

2 Q. In your, gosh, almost 20 years working at the Mp
3 153 -- actually, let me start it in the year 2000, because
4 that's when you started working there about 95 percent of
5 the time --

6 A. Right.

7 Q. -- okay?

8 Since 2000, how many times have you reported
9 a leak or a spill into the Gulf of Mexico?

10 A. I'd be scared to -- to give a definite, you know,
11 number, but it's been quite a few.

12 Q. Okay.

13 A. I mean, accident -- you know, things happen that
14 we can't control sometimes, mechanical issues.

15 Q. So, for example, if you were to tell me I -- I
16 don't know the exact number, but I've reported hundreds of
17 spills or leaks, that would be important to me versus you
18 saying, actually, it's more like five to ten?

19 A. We've -- we've reported a lot, I mean . . .

20 Q. What's a lot?

21 A. I -- I don't know the exact number, I mean, 15,
22 20 that I know of, I mean . . .

23 Q. Okay. That's what I meant --

24 A. Yeah.

25 Q. -- not 300 --

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1 A. Yeah. I mean, we've had issues, you know, after
2 hurricanes, but . . .

3 Q. If a spill or leak into the Gulf of Mexico
4 happens, that's something that you are made aware of,
5 correct?

6 A. Yes, sir.

7 Q. Do you remember -- what -- do you know what BSSE
8 is, B-S-S-E?

9 A. Yes, sir.

10 Q. What -- what are they?

11 A. Bureau -- oh -- of safety and -- I don't know the
12 acronym for it.

13 Q. What's your understanding --

14 A. It used to be MMS, Minerals Management Services,
15 and they're the ones that make the -- you know, come out
16 and keep us safe, actually.

17 Q. How often do they come out?

18 A. Like, for sure once a year, but some -- most of
19 the time, it's two or three times a year on our place.

20 Q. And it's the -- it's an arm of the federal
21 government, correct?

22 A. Yes, sir.

23 Q. What do they do when they come out?

24 A. Inspect the platform, inspect the paperwork, make
25 sure things are safe.

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1 Q. Do you remember them coming out in 2011 and
2 issuing many incomplete reports regarding the Mp 153
3 platform?

4 MR. MARLATT: Objection, form, misstates the
5 document.

6 A. I don't -- I couldn't tell you what was reported
7 in 2011. I mean, I don't have it.

8 Q. (BY MR. J. SHEPPARD) Do you ever -- let's just
9 use normal words, then. Do you ever remember BSSE coming
10 out to the Mp 153 and issuing a very negative report about
11 the conditions out there?

12 A. No, I sure don't.

13 Q. Do any of the meetings -- I said meetings. Do
14 any of the visits by BSSE since you've been at the Mp 153
15 stand out to you as significant?

16 A. Every one of them --

17 Q. Okay.

18 A. -- stands out as -- I mean, we take pride in what
19 we do, you know, when they come.

20 Q. They've been coming -- you've had interactions
21 with them since 2000?

22 A. Yes, sir.

23 Q. And they've come out at least once a year since
24 2000?

25 A. Yes, sir, but not always on -- when I'm there.

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1 Q. Right. They've certainly been out there a
2 multitude of times when you're there?

3 A. Yes, sir.

4 Q. Can you remember every single time that BSSE came
5 out there when you were there?

6 A. No, sir.

7 Q. All right. That's why I asked you. Are there
8 any of those visits while you were there that stand out to
9 you as significant?

10 A. No, sir, I mean . . .

11 MS. ASHCRAFT: Whenever you get to a
12 stopping point, can we take a break?

13 MR. J. SHEPPARD: Sure. Let me finish a
14 couple more.

15 MS. ASHCRAFT: Of course.

16 Q. (BY MR. J. SHEPPARD) Do you ever remember a time
17 after BSSE visited that the platform had to be shut in for
18 a long period of time to do repairs?

19 A. Not that I can recall.

20 Q. Do you ever remember BSSE visiting the platform
21 and concluding that many areas of the platform were poorly
22 maintained and presented an imminent threat of danger to
23 the employees?

24 A. Not that I can recall.

25 Q. That would be a very, very serious --

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1 A. Yes, sir.

2 Q. -- finding, correct?

3 A. Yes, sir.

4 Q. Do you ever remember BSSE coming out and finding
5 oil leaking into the Gulf of Mexico?

6 A. No, sir.

7 Q. If that happened, that would be something you
8 would be made aware of, correct?

9 A. Yes, sir.

10 Q. That's a very serious thing?

11 A. Yes, sir, it's an environmental impact.

12 Q. In fact, you wouldn't want BSSE to find that on
13 their own, you would want to find that by yourself --

14 A. Yes, sir.

15 Q. -- correct?

16 What I meant to say is you wouldn't want
17 BSSE to be the one that finds that, you would want to
18 self-report that on your own, correct?

19 A. Yes, sir.

20 Q. Because if BSSE comes out and finds oil leaking
21 into the Gulf of Mexico, that means you guys haven't been
22 watching things as carefully as you should, fair?

23 A. I guess so.

24 Q. Ms. Ashcraft wants to take a restroom break, so
25 let's take five minutes.

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1 A. All right.

2 THE VIDEOGRAPHER: Going off the record at
3 11:16.

4 (Short recess.)

5 THE VIDEOGRAPHER: Going on record, 11:26.

6 Q. (BY MR. J. SHEPPARD) Mr. Hadley, these prior
7 employers that you discussed with me, were you fired from
8 any of those positions?

9 A. No, sir.

10 Q. Have you ever been fired?

11 A. No, sir.

12 Q. Have you ever been disciplined by Fieldwood?

13 A. No, sir.

14 Q. Okay. Have you ever had any negative performance
15 evaluations while at Fieldwood?

16 A. Not as far as I can remember, I haven't.

17 Q. Has your work ever been criticized at Fieldwood?

18 A. No, sir.

19 Q. All right. You're different than me, then. I
20 said you're very different than me, then.

21 Tell me what you did to get ready for today.

22 A. What do you mean? Can you --

23 Q. Tell me what you did to prepare to be here today.

24 A. I drove over here.

25 Q. Did you meet with your lawyers?

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1 MR. MARLATT: Don't tell him what we talked
2 about, but tell him we met.

3 A. Yeah, I met with him yesterday afternoon, yes,
4 sir.

5 Q. (BY MR. J. SHEPPARD) So your lawyer, Mr.
6 Marlatt, who is sitting here, you met with Mr. Marlatt?

7 A. Yes, sir.

8 Q. Was anyone else present during that meeting?

9 A. No, sir.

10 Q. How long did you meet with Mr. Marlatt?

11 A. Couple of hours.

12 Q. Did you look at any documents?

13 A. Yes, sir.

14 Q. Which documents did you look at that refreshed
15 your memory?

16 A. I don't even recall what document it was. I
17 was -- I know the JSA document.

18 Q. Uh-huh.

19 A. That's -- I don't recall the other one right now
20 off the top of my head.

21 Q. You think you only looked at two documents?

22 A. I think so.

23 Q. Did you look at any contracts?

24 A. No, sir.

25 Q. Did you look at any incident reports?

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1 A. No, sir.

2 Q. Any photographs?

3 A. No, sir.

4 Q. The JSA and something else.

5 A. It wasn't -- it was a incident reporting thing.

6 That's all it was.

7 Q. Fieldwood incident report?

8 A. Yes, sir.

9 Q. Did you fill out that incident report?

10 A. No, not a report, incident reporting procedure
11 thing, that's all.

12 Q. Got it. Got it.

13 A. That's all.

14 Q. Not the actual incident --

15 A. No, sir.

16 Q. -- report for --

17 A. No, sir.

18 Q. -- Mr. Raicevic?

19 A. No, sir.

20 Q. And you're starting to talk over me a little bit
21 again.

22 A. I'm sorry.

23 Q. You looked at the Fieldwood policy for incident
24 reporting?

25 A. Uh-huh.

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1 Q. Yes?

2 MR. MARLATT: You've got to say yes or no.

3 A. Yes, sir.

4 Q. (BY MR. J. SHEPPARD) Okay.

5 A. I'm trying -- trying to think about it.

6 Q. Did you fill out a report regarding the Raicevic
7 incident?

8 MR. MARLATT: Objection, form, vague.

9 You can answer the question.

10 A. I didn't fill out an incident report for an
11 incident. There was no incident, as far as I know.

12 Q. (BY MR. J. SHEPPARD) Did you fill out a report
13 of any kind regarding Mr. Raicevic?

14 A. No, sir.

15 Q. Because -- do you -- do you know that there is a
16 Fieldwood incident report regarding Mr. Raicevic from
17 December 1st, 2014?

18 A. There's -- a medic filled out a report, I think,
19 for an evacuation.

20 Q. Okay.

21 A. All right.

22 Q. In addition to a medic report, sitting here, can
23 you remember any Fieldwood incident report regarding
24 Mr. Raicevic?

25 A. That was the --

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1 Q. Okay.

2 A. -- Fieldwood report, the medic filled that out.

3 Q. The medic filled that out?

4 A. Yes, sir.

5 Q. Who is the medic?

6 A. I'm not 100 percent sure of his complete name.

7 Marty.

8 Q. Marty.

9 Who did Marty work for?

10 A. Total Safety, maybe. I'm not 100 percent sure on
11 that.

12 Q. Does Marty still work for Total Safety?

13 A. I couldn't tell you. He don't -- he don't work
14 on our location all the time. If you need him, he comes
15 there; if you need him, you know.

16 Q. When's the last time you saw Marty?

17 A. Six, eight months ago.

18 Q. On the job?

19 A. Yes, sir.

20 Q. Do you know where he lives?

21 A. No, sir.

22 Q. Total Safety is the company that assists
23 Fieldwood with incidents?

24 A. No, sir, they're an employee for medics and
25 stuff. I'm not sure if he's -- that's who he works for.

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1 Like I said, I'm not --

2 Q. I'm not talking about Marty anymore. I'm just
3 talking about Total Safety. Who are they?

4 A. They're a contract company for the oil field, I
5 guess.

6 Q. Okay. Did you speak with anyone else to get
7 ready for today besides Mr. Marlatt?

8 A. No, sir.

9 Q. Have you spoken with any of the other lawyers
10 here in this room?

11 A. No, sir.

12 Q. What about during your breaks? Have you spoken
13 with any of the lawyers?

14 A. No, sir.

15 Q. Back in 2014, approximately, how many platforms
16 did Fieldwood have in the Gulf of Mexico?

17 A. I couldn't even answer accurately, I mean . . .

18 Q. Do you know if it's more or less than any number?
19 For example, did they have more than five?

20 A. Yes, sir.

21 Q. All right. That's what I mean. I'm going to try
22 to get as close as we can. Did they have more than 100?

23 A. It was probably close to 120, I mean, as far as I
24 know.

25 Q. Okay. What about today? How many platforms does

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1 Fieldwood have in the Gulf of Mexico that are operating?

2 A. I have no idea.

3 Q. More or less than 120?

4 A. More, I guess, I don't --

5 Q. More --

6 A. -- know.

7 Yes.

8 Q. -- you think?

9 A. I think.

10 Q. From 2013 to the present, do you remember -- do
11 you remember any significant change in the amount of
12 platforms Fieldwood was operating in the Gulf of Mexico?

13 A. Yes, sir.

14 Q. When?

15 A. I don't know exact dates, I mean . . .

16 Q. Uh-huh.

17 A. They purchased some more -- more facilities from
18 Sandridge.

19 Q. Uh-huh. Whenever that happened, the number of
20 platforms went up significantly?

21 A. Yes, sir, I -- I mean, as far as I know, it went
22 up, you know, pretty good.

23 Q. Okay. Do you remember any period of time when
24 the number of platforms that were operated by Fieldwood
25 went down?

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1 A. No, sir.

2 Q. Are Wood Group, Island, and Shamrock all still
3 helping Fieldwood operate its platforms?

4 A. Yes, sir.

5 Q. Are Wood Group, Shamrock, and Island still at the
6 Mp 153 platform?

7 A. Yes, sir.

8 Q. Have their roles at the Mp 153 platform changed
9 from 2014?

10 A. No, sir.

11 Q. What does Wood Group do out there for Fieldwood
12 at the Mp 153 B?

13 A. Contract operation.

14 Q. What about Shamrock?

15 A. Contract operations.

16 Q. What about Island?

17 A. Same, contract operations.

18 Q. Why does Fieldwood hire Wood Group, Shamrock, and
19 Island to assist with operations?

20 MR. BROUSSARD: Object to the form of the
21 question.

22 A. I -- I -- I can't answer that. I mean, I don't
23 know why they do that.

24 Q. (BY MR. J. SHEPPARD) Do you know -- I've always
25 been curious as to why they hire three as opposed to just

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1 one entity.

2 MR. BROUSSARD: Object to form.

3 MR. MARLATT: Asked and answered.

4 A. Can you repeat that?

5 Q. (BY MR. J. SHEPPARD) Why doesn't Fieldwood just
6 hire one of these companies to do contract operations?
7 Why does it hire three; do you know?

8 MR. MARLATT: Object to form.

9 A. No, sir.

10 Q. (BY MR. J. SHEPPARD) Have you ever heard any
11 discussion about that?

12 A. No, sir.

13 Q. Has that always been your experience, that
14 platform owners will hire more than one contract operator?

15 MR. BROUSSARD: Object to form.

16 A. It's been that way as long as I can remember.

17 Q. (BY MR. J. SHEPPARD) Is that how it was at
18 Zapata? Did they hire multiple contract operators?

19 A. It wasn't an operating company.

20 Q. Oh, it wasn't? Okay.

21 What did Zapata do?

22 A. A drilling company.

23 Q. Who are the people that do the contract
24 operations today for Wood Group?

25 MR. BROUSSARD: Counsel, can we assume you

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1 mean at 153?

2 MR. J. SHEPPARD: At the 153 B platform.

3 A. That just work for Wood Group?

4 Q. (BY MR. J. SHEPPARD) Uh-huh.

5 A. They have Huston Biddle.

6 Q. Huston what?

7 A. Biddle.

8 Q. Huston --

9 A. Just got --

10 Q. -- Biddle.

11 A. -- hired on. He's a under-six-month employee.

12 Q. Okay.

13 A. And then we have a mechanic that's -- he's not a
14 operator, mechanic.

15 Q. For Wood Group?

16 A. Uh-huh.

17 Q. What's his name?

18 A. Tommy Barrett.

19 Q. How long has he worked for Wood Group, as far as
20 you know?

21 A. I couldn't tell you.

22 Q. Two years, one year, one month?

23 A. I couldn't tell you.

24 Q. One month, maybe?

25 A. I couldn't tell you. I mean, I really couldn't.

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1 Q. So sometimes when people say they can't tell
2 me --

3 A. Well --

4 Q. -- I ask -- I ask some follow-up questions.
5 Because he's worked there more than one day, right?

6 A. Yes, sir, I guess so. He's worked for me more
7 than one day.

8 Q. Okay. So I'm going to try and narrow in --

9 A. Okay.

10 Q. -- as best as you know.

11 Is it your best approximation that he's
12 worked for Wood Group for more than a year?

13 A. Yes, sir.

14 Q. Okay. What about two years?

15 A. I couldn't tell you if --

16 Q. That's when we start to have a hard time.

17 A. He -- he's worked on my loc -- on 153 B for a
18 little over a year --

19 Q. Perfect.

20 A. -- and that's it.

21 Q. That's why I -- I'm not picking on you --

22 A. I know what you're saying.

23 Q. -- when I ask the follow-up.

24 MR. BROUSSARD: Look, I know you're going to
25 get to IOC, so can I just interject a second, John? Are

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1 you asking him how long the guy worked for Wood Group at
2 his platform --

3 THE WITNESS: Yeah --

4 MR. BROUSSARD: -- or are you asking him --

5 THE WITNESS: -- yeah, yeah, I mean,
6 that's --

7 MR. BROUSSARD: -- how long --

8 THE REPORTER: Whoa, whoa, whoa, whoa.

9 MR. BROUSSARD: Stop. I'm talking right
10 now.

11 THE WITNESS: I'm sorry.

12 MR. BROUSSARD: You didn't ask him that.
13 That's what --

14 MR. J. SHEPPARD: Yeah --

15 MR. BROUSSARD: -- I'm pointing out.

16 MR. J. SHEPPARD: -- I think we're doing
17 okay.

18 THE WITNESS: I apologize.

19 Q. (BY MR. J. SHEPPARD) So I wanted to -- when I
20 ask follow-up questions, sometimes people say I have no
21 idea. And I don't mean to pick on you. Then I dig a
22 little deeper. And you gave the exact answer I was
23 looking for, that he's been at your platform with Wood
24 Group for a little over a year. That's exactly the
25 approximation I was looking for. So thank you.

James Hadley
July 13, 2017

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1 Who else from Wood Group is working out at
2 the platform?

3 A. That's it.

4 Q. What about David Foret?

5 A. He don't work there no more.

6 Q. When did he stop working at the platform?

7 A. I don't know the exact date.

8 Q. About when?

9 A. It's been two years ago, I guess.

10 Q. What about Tracy Olivier? Is he still involved
11 with the platform?

12 A. Yes, sir.

13 MS. ASHCRAFT: Object, vague. But I don't
14 have a microphone.

15 Q. (BY MR. J. SHEPPARD) What does he do?

16 MR. BROUSSARD: Just put it right here, and
17 we can both grab it.

18 A. Mechanical supervisor, maybe. I guess that's his
19 title. Never really asked him his title.

20 Q. (BY MR. J. SHEPPARD) Does he report to you?

21 A. Me and Sean Bernard, if he's working on 153 B.

22 Q. Okay. When he's working at the 153 B, he reports
23 to you and Sean Bernard?

24 A. Uh-huh.

25 Q. What does Sean Bernard do?

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1 MR. MARLATT: Is that a yes?

2 A. Yes, sir.

3 MR. J. SHEPPARD: Yeah, thank you, Ryan.

4 Q. (BY MR. J. SHEPPARD) What does Sean Bernard do?

5 A. He is the mechanical super -- superintendent.

6 Q. Who does he work with?

7 A. Fieldwood.

8 Q. Where is Tracy Olivier based?

9 A. I have no idea.

10 Q. It's not at the 153 B?

11 A. No, sir.

12 Q. And it's not out in the field, either?

13 A. Not in our field.

14 Q. Is it your understanding that he's based onshore
15 somewhere?

16 A. I really -- every time I've talked to him, he's
17 been all over the place, you know.

18 Q. Has he ever been to the 153 B?

19 A. Yes, sir.

20 Q. Anyone else from Wood Group that we can think of
21 that does work associated with the 153 B?

22 A. An air compressor mechanic comes by and does
23 quarterlies.

24 Q. What's his name?

25 A. I haven't really met him. Don't know him. His

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1 first name's Michael. That's all I know.

2 Q. I thought you said his name was Eric?

3 A. No, I said Michael.

4 Q. Michael is a mechanic for Wood Group?

5 A. Air compressor mechanic.

6 Q. Air compressor.

7 A. Air compressor, not Eric. I'm sorry.

8 Q. Okay. What about Island? We're going to go
9 through the same thing with Island. Who are the people?

10 A. Adam Lewis.

11 Q. Okay. Uriah Langston?

12 A. He's not there anymore.

13 Q. Uriah Langston.

14 Who else?

15 A. Dwayne -- I can't think of his last name right
16 now. Son of a gun. I can't think of his last name, but
17 he's not been there very long.

18 Q. Okay.

19 A. That's it as far as --

20 Q. What did --

21 A. -- Island.

22 Q. Sorry. What does Adam Lewis do for Island?

23 A. He's a lead operator.

24 Q. What does Dwayne do?

25 A. He's a B operator.

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1 Q. B operator?

2 A. Yes, sir.

3 Q. Is Adam Lewis a lead A operator?

4 A. I guess that's their title. Lead operator is
5 what -- what I was told, you know.

6 Q. You used the term "lead operator" for Adam Lewis
7 and B operator for Dwayne?

8 A. Yeah, that's the designation we use, I guess.

9 Q. What about Uriah Langston? What was his title as
10 far as you understood it?

11 A. C operator, I believe.

12 Q. And I think I'm on to Shamrock now. Who are the
13 people?

14 A. We have Michael Castleberry.

15 Q. Okay.

16 A. That's it on my side.

17 Q. What about Joshua Trahan for Wood Group?

18 A. He's no longer there.

19 Q. No longer there?

20 A. Yeah.

21 Q. Does Charles Anderson still go out to the
22 Mp 153 B?

23 A. Yes, sir.

24 Q. I'm going to ask you some more names, and I want
25 to know if they still go out there. John Wilson for

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1 Island?

2 A. I don't know. I've never heard that name.

3 Q. And -- and for these people, if you could tell me
4 if you've never heard of them, that would be useful, too.

5 D. Kervin for Wood Group?

6 A. I've never heard D. Kervin.

7 Q. Danny Moss for Linear?

8 A. Danny Moss.

9 Q. Does he still go out there?

10 A. Yes, sir.

11 Q. Okay. Dale Belton for Greens?

12 A. No, sir, he don't come out there no more.

13 Q. When's the last time he went out to the Mp 153 B?

14 A. About three years ago.

15 Q. Okay. Mike Perryman?

16 A. Yes, sir.

17 Q. He still goes out there?

18 A. He work -- he's a mechanic on the other crew.

19 Q. Does he still go out there?

20 A. Yes, sir.

21 Q. Paul Van Nattan for Panther?

22 A. I've never heard of that name.

23 Q. Tyler Schoenberger?

24 A. Never heard of him.

25 Q. Percy Hebert?

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1 A. Don't remember the name.

2 Q. Okay. Robert May for Intertex?

3 A. I believe that's Robert that works for my other
4 crew as a meter guy, yeah.

5 Q. He still goes out there?

6 A. Yes, sir, I believe so.

7 Q. Pete Harris for Intertex?

8 A. I hadn't heard that one.

9 Q. Dillon Romero for Shamrock?

10 A. I haven't -- couldn't tell you by that name.

11 Q. Okay. Have you fired anyone off the Mp 153 B
12 platform?

13 A. Yes, sir.

14 Q. Who?

15 A. Who?

16 Q. Uh-huh.

17 A. John Hleska.

18 Q. Why was he fired?

19 A. He wouldn't follow directions and had a bad
20 attitude.

21 Q. What directions wouldn't he follow?

22 A. Directions given to him from the PIC or the lead
23 operator.

24 Q. What specific directions do you remember giving
25 John Hleska that he didn't follow?

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July 13, 2017

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1 A. Can you repeat that again?

2 Q. What specific directions do you remember giving
3 John that he did not follow?

4 A. Just day-to-day operations. If you tell him to
5 do something, ask him to do something, he didn't really
6 like hearing it from a younger PIC.

7 Q. Was there any specific incident with him or was
8 it just an accumulation of small things?

9 A. We had digital gauges that needed to be
10 calibrated --

11 Q. Uh-huh.

12 A. -- and I -- I asked him not to use them until
13 they were calibrated. And, sure enough, he was using them
14 again, and that was it, told him, I said, "We needed to
15 talk," and he -- pretty much, that was the end of the --
16 our business relationship.

17 Q. And he worked for Island, correct?

18 A. Yes, sir.

19 Q. Does he still work for Island?

20 A. I'm not sure.

21 Q. You said, I don't want you back out on this
22 platform ever again?

23 A. Ronnie Bonin is actually the one that discussed
24 it with him and, you know, put him -- we sent him in, and
25 he was no longer in -- on our contract.

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1 Q. You said he had a bad attitude. And what was the
2 bad attitude?

3 A. Not wanting to listen to anything anybody told
4 him. He knew it.

5 Q. Did he have any issues with the other crew
6 members?

7 A. Not that I know of.

8 Q. Did you fire anyone else off the platform?

9 A. We had -- I have, yes, sir.

10 Q. Who else?

11 A. I can't remember his name. He was a Wood Group
12 hand, a young -- younger guy.

13 Q. When did you fire him from the platform?

14 A. January of this year.

15 Q. When had he started working at the platform?

16 A. November, I believe, of 2016.

17 Q. When you give instructions to people out at the
18 platform, you expect them to follow them, correct?

19 A. Yes, sir.

20 Q. And they have to follow them, correct?

21 A. Yes, sir.

22 Q. That goes for everyone out there?

23 A. Yes, sir.

24 Q. Did you ever see Mr. Raicevic fall at the
25 platform?

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1 A. No, sir.

2 Q. Did you ever see him getting up from a fall?

3 A. No, sir.

4 Q. Did an alarm go off at the platform in the early
5 morning hours of December 1st, 2014?

6 A. I couldn't honestly tell you. I don't know,
7 so -- I don't remember an alarm.

8 Q. Okay. You know that this case is about
9 Mr. Raicevic alleging that he fell in the early morning
10 hours on December 1st, 2014, correct?

11 A. Yes, sir.

12 Q. You've heard that before?

13 A. Yes, sir.

14 Q. And he says that he was sleeping and the alarm in
15 his room indicating there was an issue went off and he got
16 up to attend to it, right?

17 A. Yes, sir.

18 Q. And you've known about that allegation, at least,
19 for quite some time, right?

20 A. Yes, sir.

21 Q. And your memory today is better than it's going
22 to be a year from now, right?

23 A. Yes, sir.

24 Q. All right. So I want you to really rack your
25 brain. You have no recollection one way or the other of

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1 an alarm going off on December 1st, 2014, correct?

2 A. That's correct.

3 Q. Have you discussed that allegation with other
4 people?

5 A. No, sir.

6 Q. Have you ever discussed with anyone, with the
7 exception of your lawyers, whether or not Mr. Raicevic
8 fell on December 1st, 2014, and whether or not an alarm
9 went off on December 1st, 2014?

10 A. No, sir.

11 Q. And by "with anyone," I mean anyone, anyone at
12 the platform, anyone onshore, anyone.

13 A. No, sir.

14 Q. Have you ever discussed with Charles Anderson
15 those issues, whether or not Mr. Raicevic fell or whether
16 or not an alarm went off on December 1st, 2014?

17 A. No, sir. The only thing that was discussed with
18 him was he said he had to go to a deposition. That was
19 it.

20 Q. But you and him did not discuss Mr. Raicevic,
21 this case, the allegations --

22 A. No, sir.

23 Q. -- or what may or may not have happened on
24 December 1st, 2014, at all?

25 A. No, sir.

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1 Q. And, in fact, you've never discussed that with
2 anyone besides your lawyer?

3 A. No, sir.

4 Q. Correct?

5 A. That's correct.

6 Q. When an alarm goes off -- alarms do go off at the
7 platform in the middle of the night, correct?

8 A. Yes, sir.

9 Q. When they do go off, an alarm sounds in your room
10 and the mechanic's room, correct?

11 A. No, sir.

12 Q. Where does the alarm sound?

13 A. The alarm sounds throughout the quarters
14 building. They do have some alarms, old stuff, I don't
15 even know if it still works, upstairs in the lead
16 operator's room. As far as -- the annunciator on it just
17 goes out through the quarters building.

18 Q. Okay. You're not aware of any alarm that sounds
19 only in the mechanic's room and your room?

20 A. There's not one.

21 Q. Okay. And by -- and mechanic's room, I'm using
22 that to refer to the room that Mr. Raicevic would have
23 been sleeping in.

24 A. Right, there's no -- there's not a -- just an
25 alarm that goes off in there.

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1 Q. I just want to make sure I'm using the right
2 words. Mr. Raicevic was a mechanic, correct?

3 A. Yes, sir.

4 Q. The mechanic has a room on the Mp 153 B?

5 A. Yes, sir.

6 Q. It's his room and only his room?

7 A. No, sir.

8 Q. Who else sleeps in there?

9 A. There's -- whoever needs to.

10 Q. How many beds are in there?

11 A. There's three.

12 Q. Okay. Got it. What do you refer to that room
13 as?

14 A. It's been referred to as the mechanic's room.

15 Q. Okay. Then I think I'm comfortable using that
16 term.

17 A. Yeah.

18 Q. Okay. It's your understanding that if an alarm
19 goes off, it sounds everywhere in the living quarters?

20 A. Yes, sir.

21 Q. Are you saying that every single room in the
22 living quarters has a speaker?

23 A. No, sir.

24 Q. Where does the sound come out of? Where are the
25 speakers in the living quarters?

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1 A. We have an annunciator with the speakers on it,
2 and then in the offices, you have a speaker that
3 illuminates it through the quarters. It's a piercing
4 sound.

5 Q. Okay. You're aware of two locations where the
6 noise comes out, correct?

7 A. Actually, four.

8 Q. Okay. Let's go through all four. You said an
9 annunciator, which is a word I don't know, and then a
10 speaker in the offices?

11 A. You have -- the annunciator that actually gives
12 you the alarm. It relays from the master panel to that
13 alarm, and then it goes from there to -- we have two
14 speakers in each office. They're small speakers, you
15 know. So you've got four -- actually, six speakers that
16 I -- that I know of.

17 Q. Okay. So I know you're probably tired of
18 answering questions about this, but I think it's
19 important.

20 A. Yes, sir.

21 Q. Does the annunciator itself have any speakers on
22 it?

23 A. Yes, sir.

24 Q. So there is actually noise coming from the
25 annunciator?

James Hadley
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1 A. Yes, sir.

2 Q. Does it have two speakers?

3 A. It has one on it, and then there's one in the
4 office itself.

5 Q. Where is the annunciator actually located?

6 A. In the electrician and mechanic's office.

7 Q. Is that one office or is that two offices?

8 A. It's one.

9 Q. And that's not where people are sleeping?

10 A. No, sir.

11 Q. So that's one of our six speakers?

12 A. Yes, sir.

13 Q. All right. Where are the other five speakers?

14 A. You got one in each office. My office, you got
15 one there -- actually, there's one in the lead operator's
16 office or operator's office, and then there's one in the
17 galley. I'm sorry. That's the other one.

18 Q. That's three more places.

19 A. Right.

20 Q. Now, where are the remaining two speakers?

21 A. You got one in the TV room and then one at the
22 edge of the hallway right there. It's -- I'm trying to
23 think if there's any more in that section. And then they
24 got two speakers on -- in the living -- living quarters up
25 above, one on each end of the hall. It goes through the

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1 annunciator -- I mean, Guytronix speakers, it goes
2 through it up there.

3 Q. Uh-huh.

4 A. That's the only ones that I know of.

5 Q. I think our number has maybe grown a little bit
6 more than six.

7 A. Well, I'm --

8 Q. No, is that okay, though?

9 A. Yeah.

10 Q. It sounds like there might be more than six?

11 A. There may be, yeah.

12 Q. So let me try to reverse it. Are there any alarm
13 speakers in the mechanic's bedroom?

14 A. I'm not sure if they're still in there or not.
15 Like I said, they have -- years ago, there were speakers
16 in that -- you know, in your main rooms. But there is
17 no -- there has no -- been no speakers in a while --

18 Q. Okay.

19 A. -- that I know of.

20 Q. And I'm just going for your understanding. Your
21 understanding is there are no working speakers in the
22 mechanic's sleeping quarters?

23 A. Yes, sir.

24 Q. And there haven't been since 2014?

25 A. I couldn't tell you if it was before then or

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1 after then, honestly. I don't go up and inspect their --
2 you know, their rooms every day or every time I'm out
3 there. They -- we don't mess with those speakers or
4 whatever.

5 Q. Okay.

6 A. They changed the Guytronix out -- it had to be in
7 two thousand -- that was before 2014, so there would --
8 shouldn't been a speaker in there.

9 Q. Okay. Are you saying the word "electronics"? It
10 almost sounds like you're saying Guytronix.

11 A. Electronics?

12 Q. Electronics.

13 A. I said Guytronix speaker.

14 Q. Guytronix speaker.

15 A. A Guytronix speaker.

16 Q. Am I saying it right, Guytronix?

17 A. Guytronix, yes, sir.

18 Q. Okay. What is a Guytronix speaker?

19 A. That's how we communicate outside and all. We
20 have speakers and . . .

21 Q. All right. So it's your understanding that
22 before 2014, the electronics were changed and the speakers
23 in the mechanic's room were no longer used?

24 A. Yes.

25 Q. All right. Before that change occurred -- are

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1 you with me?

2 A. Yes, sir.

3 Q. -- were there two alarm systems or was there only
4 one?

5 A. Can -- can you repeat that, the way --

6 Q. I'm not talking about today. I'm talking about
7 before the electronics were changed.

8 A. Uh-huh.

9 Q. Okay? Were there two alarm systems or was there
10 only one?

11 A. There were two.

12 Q. All right. Now there's only one?

13 A. There's two.

14 Q. There's still two. All right.

15 What are the two alarm systems today?
16 There's the one we've just described at length with all
17 these speakers.

18 A. Right.

19 Q. What's the other one?

20 A. Air horn.

21 Q. All right. Where does the air horn sound from?

22 A. Where does it come from?

23 Q. Correct.

24 A. The master panel.

25 Q. Does it sound -- does it go off at the same time

James Hadley
July 13, 2017

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1 that this other system is going off?

2 A. Yes, sir.

3 Q. All right. So I think my question about there
4 being two systems may have been confused -- confusing. I
5 want to know if there's one set of speakers that goes off
6 for certain occasions and a different system that goes off
7 on different occasions. Does that make sense?

8 A. We have a -- one system that goes off.

9 Q. Bingo. And that has always been the case?

10 A. No.

11 Q. Was there a time when that was different?

12 A. Yes.

13 Q. When?

14 A. Years ago.

15 Q. What was the difference years ago?

16 A. When you have a temp scanner alarm, they had a
17 horn by itself years ago --

18 Q. Okay.

19 A. -- on a compress -- gas compressor.

20 Q. Okay. So years ago --

21 A. Uh-huh.

22 Q. -- there was one type of alarm that was separate
23 from the other types of alarm --

24 A. Yes.

25 Q. -- and that was the temps scanner alarm

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July 13, 2017

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1 concerning the gas compressor?

2 A. Yes, sir.

3 Q. Yes?

4 A. Yes, sir.

5 Q. You're talking so quiet.

6 A. It's a different tone is all it was on the -- you
7 had a different tone for a air horn --

8 Q. Uh-huh.

9 A. -- and a light that would blink.

10 Q. Uh-huh.

11 A. And that was right after I got there it was
12 discontinued.

13 Q. Back in 2000?

14 A. Yes, sir.

15 Q. So it -- what you're describing, this different
16 tone and a light for only the temps scanner alarm, was
17 discontinued shortly after the year 2000?

18 A. Yes, sir.

19 Q. And that was the same system, it just had a
20 different tone and a light based on what was triggering
21 it?

22 A. Yes, sir.

23 Q. All right. So in 2014, there was one system, one
24 tone that sounded from all the alarms no matter what the
25 alarm was?

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July 13, 2017

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1 A. Yes, sir.

2 Q. Okay. And you described that sound as a loud
3 piercing sound?

4 A. Yes, sir.

5 Q. Are you saying yes?

6 A. Yes, sir.

7 Q. You're almost whispering.

8 MR. MARLATT: Do you need some water?

9 A. I'm trying to think. Can you repeat your
10 question --

11 Q. (BY MR. J. SHEPPARD) Yeah.

12 A. -- the last question?

13 Q. Yeah.

14 A. The way -- the way you asked it. Is there one
15 system. Can you repeat it?

16 Q. And by "system," I mean all of the speakers are
17 all connected and they all go off when an alarm is
18 sounded, correct?

19 A. Yes, sir.

20 Q. And there's just -- back in 2014, there was just
21 one system that triggered all of the alarms?

22 A. Yes, sir.

23 Q. Okay. And how would you describe the sound made
24 by those alarms?

25 A. Just like a screeching noise.

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July 13, 2017

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1 Q. Okay. When an alarm goes off and the mechanic --
2 let me start over.

3 When an alarm goes off, is the mechanic
4 required to attend to it?

5 A. Yes, sir.

6 Q. Yes?

7 A. Depending on if it's a mechanical situation.

8 Q. But when the alarm first goes off, you don't know
9 what it's for?

10 A. Right, you have to go to your master panel and
11 you see what's going on.

12 Q. Where is the master panel?

13 A. Located on the plus 40 production level.

14 Q. On the first floor?

15 A. On the production level, the plus 40.

16 Q. Plus 40.

17 A. Yeah.

18 Q. All right. I've never heard that before. So I'm
19 going to need you to explain it to me. What's a plus 40?

20 A. That's just the production deck. That's how high
21 it is out of the water.

22 Q. 40 feet?

23 A. Yes, sir.

24 Q. Okay. So plus 40 means the production level.
25 That's the first level of the platform that's roughly

James Hadley
July 13, 2017

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1 40 feet above the water?

2 A. Yes, sir.

3 Q. The living quarters are above that, correct?

4 A. Yes, sir.

5 Q. So the mechanic, when an alarm goes off, has to
6 get out of his room and go down to the production deck,
7 correct?

8 A. No, sir.

9 Q. Is he on the production deck?

10 A. He doesn't go to the production -- he don't go to
11 the production deck. He goes to either where we need him;
12 if we need him down there, if we need him in the
13 compressor building; or if the compressor goes down, he
14 goes.

15 Q. Okay. The reason why I thought he goes to the
16 production deck is because you said when an alarm goes
17 off, he has to go visit the master panel, correct?

18 A. No, I didn't --

19 Q. You didn't say that?

20 A. I didn't say that.

21 Q. Who goes to visit the master panel after an alarm
22 goes off?

23 A. The production operators.

24 Q. Okay. It's your testimony when an alarm goes
25 off, the production operators go and look at the master

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July 13, 2017

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1 panel, and then, I guess, you're going to tell me and then
2 tell the mechanic where to go?

3 A. Right, if -- where -- where we need him over the
4 Guytronix.

5 Q. Over the Guytronix?

6 A. Yes, sir.

7 Q. They will announce it over the speaker?

8 A. Yes, sir.

9 Q. If they see him, they can also just tell him,
10 correct?

11 A. Yes, sir.

12 Q. All right. I think I got what you're saying.

13 And the master panel will tell the operator
14 where there's a problem and where the mechanic needs to
15 go?

16 A. Yes, sir.

17 Q. Can you read the master panel and decipher what
18 the problem is and where the mechanic needs to go?

19 A. Yes, sir.

20 Q. Okay. You know how to do that?

21 A. Yes, sir.

22 Q. What's the panel in the compressor room called?

23 A. Compressor panel.

24 Q. That's different than the master panel?

25 A. Yes, sir.

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July 13, 2017

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1 Q. The master panel's smaller?

2 A. No, sir.

3 Q. It's just as big?

4 A. Bigger.

5 Q. Okay. Let me see if I've got photos of the right
6 stuff. I'm going to mark it -- I'm holding up -- is that
7 the master panel?

8 A. I don't know. I can't tell. I can't tell.

9 Q. Why don't we mark this.

10 A. Yeah, it's a good picture.

11 MS. ASHCRAFT: You don't have extra copies,
12 do you?

13 MR. J. SHEPPARD: Yeah, I have one extra
14 copy.

15 MS. ASHCRAFT: Ryan, do you want it?

16 MR. MARLATT: I'll pass it around as soon as
17 I take a look at it.

18 MS. ASHCRAFT: Okay.

19 (Exhibit 1 marked.)

20 Q. (BY MR. J. SHEPPARD) I'm creating -- this is
21 Exhibit 1 to your deposition.

22 A. No, that's -- that's --

23 MR. MARLATT: Wait until he asks a question.

24 Q. (BY MR. J. SHEPPARD) Yeah.

25 A. I'm sorry.

James Hadley
July 13, 2017

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1 Q. Okay. I'll represent to you your lawyer sent me
2 these photos.

3 A. Uh-huh.

4 Q. And if you'll look at the front --

5 MR. MARLATT: Hang on. Those don't have my
6 Bates label on them.

7 MS. ASHCRAFT: Those are --

8 MR. J. SHEPPARD: Yeah, they do.

9 MS. ASHCRAFT: -- Wood Group.

10 MR. J. SHEPPARD: Oh, excuse me. You're
11 right.

12 Q. (BY MR. J. SHEPPARD) Wood Group's lawyers sent
13 me these documents.

14 A. Okay.

15 Q. I thought it was Fieldwood.

16 You see the front of Exhibit 1 to your
17 deposition, there's a little sticker on this glass panel.
18 It says Mp 153 B. Do you see that?

19 A. Yes, sir.

20 Q. And if you go to the next page, you'll have what
21 I believe is a closer-up photo of -- of the first page to
22 Exhibit 1. Do you see that?

23 A. Yes, sir.

24 Q. Okay. What is -- what are we looking at? Do you
25 know what we're looking at?

James Hadley
July 13, 2017

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1 A. Yes, sir.

2 Q. Yes. What is it?

3 A. Annunciator panel.

4 Q. That's the annunciator panel?

5 A. Yeah, annunciator, I'm sorry.

6 Q. I actually don't even know what that word means,
7 but I'm going off what you're saying.

8 A. Right.

9 Q. Annunciator panel. But there's a speaker on this
10 panel somewhere, correct?

11 A. Yes, sir.

12 Q. This is located on what floor of the platform?

13 A. This is in the office -- mechanic and
14 electrician's office.

15 Q. Which is what, the second floor?

16 A. First floor.

17 Q. First floor?

18 Let me make sure I get the floors right. Is
19 the production level the first floor?

20 A. Are you talking about in the oil -- in the living
21 quarters or are you talking about the platform itself?

22 Q. Platform itself. What -- we can use your
23 terminology. What's the first level called?

24 A. Plus 10.

25 Q. Plus 10?

James Hadley
July 13, 2017

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1 A. Yeah.

2 Q. Okay. And that's what, where you get -- where
3 you load things and get off things?

4 A. That's where -- the boat landing. You got a boat
5 landing, you got a plus 10.

6 Q. All right. What's the second level?

7 A. Plus 40.

8 Q. That's the production deck?

9 A. Yes, sir.

10 Q. That's where the compressor building is kept?

11 A. No, sir.

12 Q. Where is the compressor building?

13 A. Plus 80, on the same level as the living
14 quarters.

15 Q. Plus 80?

16 A. Yes, sir.

17 Q. Got it.

18 Is there anything above the plus 80?

19 A. Except for the living quarters.

20 Q. Okay. So maybe I'm confused. From where
21 Mr. Raicevic is sleeping at night --

22 A. Uh-huh.

23 Q. -- if he wants to go to look at the actual
24 compressor --

25 A. Uh-huh.

James Hadley
July 13, 2017

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1 Q. -- does he have to go down a set of stairs?

2 A. Yes, sir.

3 Q. All right. What level is he sleeping on?

4 A. He's sleeping on the second level of the living
5 quarters.

6 Q. Got it.

7 The living quarters is on the plus 40, but
8 it's got two -- two stories?

9 A. It's on the plus 80.

10 Q. The living quarters is on the plus 80?

11 A. Yeah.

12 Q. Living quarters is not on the plus 40?

13 A. No.

14 Q. Where are the offices?

15 A. On the plus 80. That's the first floor of the
16 living quarters.

17 Q. I don't know if I'm the only one in the room
18 that's thoroughly confused. Maybe it's because my
19 questions are no good.

20 He does -- Mr. Raicevic, if he's sleeping at
21 night and needs to go to the compressor building to check
22 on it, he does need to go down a set of stairs, correct?

23 A. Yes, sir, in the living quarters.

24 Q. He's starting off at the living quarters,
25 correct?

James Hadley
July 13, 2017

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1 A. Yes, sir.

2 Q. Which is on the plus 80 level?

3 A. The living quarters is here.

4 Q. Uh-huh.

5 A. You got three stories of living quarters.

6 Q. Uh-huh.

7 A. Those are -- the living quarters is set on the
8 plus 80 --

9 Q. Okay.

10 A. -- okay? When you come in living quarters, you
11 got the first floor. You go up a set of stairs to the
12 second floor, another set of stairs to the third floor.
13 That's -- that's what I was meaning. I didn't --

14 Q. No, that's perfect.

15 And Mr. Raicevic slept on what level of the
16 living quarters?

17 A. Second.

18 Q. So an alarm goes off, he wants to go check in the
19 compressor building, he leaves his bedroom on the second
20 level of the living quarters, correct?

21 A. Uh-huh.

22 Q. And walk me through all the stairs and levels he
23 must take to go look at the compressor.

24 A. He comes out one -- down one set of stairs and
25 across two sections and up another set of stairs to the

James Hadley
July 13, 2017

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1 compressor building just like a stairway -- ten steps, I
2 guess.

3 Q. Okay. And the compressor building is on what
4 level, plus 80 or plus 40?

5 A. Plus 80.

6 Q. It's on plus 80. Got it.

7 Okay. On the first level of the plus 80,
8 the first story?

9 A. Yes, sir.

10 Q. All right. Is that frustrating?

11 A. No, sir.

12 Q. The annunciator panel that we're looking at,
13 where is this located?

14 A. Mechanic and electrician's office.

15 Q. And what level of the living quarters is that
16 located at?

17 A. The first floor.

18 Q. Okay. This is not the master panel?

19 A. No, sir.

20 Q. Looking -- if an alarm goes off, does anything
21 light up on this annunciator panel?

22 A. Yes, sir.

23 Q. Okay. When that happens, does that tell you
24 where the problem is?

25 A. Yes, sir.

James Hadley
July 13, 2017

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1 Q. If there's a problem in the compressor, which
2 light comes on?

3 A. You have two lights. You have one that says
4 compressor temp scan --

5 Q. Uh-huh.

6 A. -- and then compressor -- I can't -- I don't
7 remember exactly what it says, compressor down or
8 compressor shutdown.

9 Q. If you look at the second page, you might be able
10 to make it out.

11 A. Yeah, compressor shutdown.

12 Q. Okay. So if you -- here's a -- I'll give you a
13 pen.

14 A. Uh-huh.

15 Q. If you can circle what lights come on if there's
16 a problem with the compressor.

17 A. These two right here, either/or, or both.
18 You can -- you can get one alarm by itself, the -- the
19 compressor temperature scan, it will blink, and if you fix
20 it, it will go back off. If not, it will shut down.

21 MR. MARLATT: Let him ask a question.

22 A. I'm sorry.

23 Q. (BY MR. J. SHEPPARD) So if either of those two
24 lights go on, the person looking at that knows I need to
25 go visit the compressor building because that's where the

James Hadley
July 13, 2017

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1 problem is?

2 A. Yes, sir.

3 Q. Okay. But they don't know if those two lights
4 come on what the specific problem is, do they?

5 A. No, sir.

6 Q. They still have to go to the compressor building
7 and figure that out, right?

8 A. Yes, sir.

9 (Exhibit 2 marked.)

10 Q. (BY MR. J. SHEPPARD) Let me give you Exhibit 2
11 to your deposition. Have you seen this before?

12 A. Yes, sir.

13 Q. What are we looking at here, Exhibit 2?

14 A. Compressor panel.

15 Q. Okay. Does anything light up on the compressor
16 panel when an alarm goes off?

17 A. Yes, sir.

18 Q. Which of these are lights that can come on if
19 there's a problem?

20 A. The temp scan.

21 Q. Circle the temp scan for me.

22 A. (Witness complies.)

23 Q. And that looks like a little keypad, black panel
24 that you've circled, correct?

25 A. Yes, sir.

James Hadley
July 13, 2017

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1 Q. And if there's an alarm and a --

2 MS. ASHCRAFT: John, can you show us where
3 that is, please.

4 MR. J. SHEPPARD: Sure. He circled right
5 there.

6 MS. ASHCRAFT: Okay.

7 Q. (BY MR. J. SHEPPARD) If there's an alarm
8 involving -- what does it have to involve, temperature?

9 A. Temperature imbalance.

10 Q. What does balance mean?

11 A. I'm not 100 percent sure. That's just what I was
12 told, when an alarm goes off, call a mechanic.

13 Q. Okay. Then that -- if that happens, temperature
14 imbalance, then this black panel will be reacting in some
15 way?

16 A. Yes, sir.

17 MR. BROUSSARD: Can I ask if the word that's
18 being said is balance or ballast?

19 THE WITNESS: Balanced. Temperature --

20 MR. BROUSSARD: Balance --

21 THE WITNESS: -- imbalanced.

22 MR. BROUSSARD: -- b-a-l-a-n-c-e?

23 MR. MARLATT: Temperature imbalance.

24 MR. BROUSSARD: Okay. Thank you.

25 Q. (BY MR. J. SHEPPARD) Oh, are you saying

James Hadley
July 13, 2017

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1 temperature imbalance or temperature and balance?

2 A. Temperature imbalance.

3 Q. Imbalance?

4 A. Yeah.

5 Q. Got it.

6 What does this panel do when that occurs?

7 A. It will either alarm or shut down.

8 Q. I mean, what -- does the actual panel blink?

9 Does it turn green?

10 A. You have a red blinking light on it that tells
11 you when you got an Alarm 1 or an Alarm 2.

12 Q. What's an Alarm 1?

13 A. Just an alarm.

14 Q. Meaning there's something wrong?

15 A. Meaning there's something wrong, you need to --
16 you need to check it and check your temperatures.

17 Q. What's an Alarm 2?

18 A. Shut down.

19 Q. It's about to shut down?

20 A. No, they shut down.

21 Q. It's already shut down?

22 A. It shuts down immediately with an Alarm 2.

23 Q. Okay. Are there sometimes where something start
24 out an Alarm 1 and becomes an Alarm 2?

25 A. Yes, sir.

James Hadley
July 13, 2017

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1 Q. The problem has progressed and not been fixed, so
2 we'll go from blinking Alarm 1 to we're shutting down
3 Alarm 2?

4 A. Yes, sir.

5 Q. Is there a different light that happens when it
6 goes to Alarm 2?

7 A. Yes, sir.

8 Q. What is the difference?

9 A. It's just in a different spot.

10 Q. On this panel here?

11 A. Yes.

12 Q. Can you point -- can you point that out on this
13 panel --

14 A. I mean.

15 Q. -- where the Alarm 1 versus Alarm 2 is?

16 A. Alarm 1's right here, and Alarm 2's right there.

17 Q. And put a 1 by the dot you just put for Alarm 1.

18 A. 1.

19 Q. And put a 2.

20 A. And 2.

21 Q. Okay. I want to make sure --

22 MR. MARLATT: That's -- that's what I'm
23 trying to figure out. Okay. You can barely.

24 Q. (BY MR. J. SHEPPARD) I can read it. Your 2
25 barely looks like a 2, but the 1 is clearly a 1, but I got

James Hadley
July 13, 2017

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1 it. It's good enough.

2 MR. MARLATT: No worries. This isn't a
3 handwriting test.

4 Q. (BY MR. J. SHEPPARD) No, it's fine. I know it's
5 small.

6 Okay. Is there anything else on this master
7 panel that will trigger or react if there's a problem with
8 the compressor?

9 A. Yes, sir.

10 Q. There's lots of things, right?

11 A. Yes, sir.

12 Q. Can you point out anything else that might
13 trigger -- that does trigger when there's a problem?

14 A. Yes, sir, there's -- I mean, this is what that
15 panel does. It -- every -- it monitors, and when you have
16 an upset, it -- it shuts things down.

17 Q. Essentially all of these gauges, if they get out
18 from where they need to be, can trigger an alarm and --
19 and ultimately cause the shutdown?

20 A. Yes, sir.

21 Q. Do you know where the gauge or the alarm or the
22 sensor for the Tribone pump is?

23 A. The -- the what now?

24 Q. Do you know what a Tribone pump is? Have you
25 ever heard of that?

James Hadley
July 13, 2017

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1 A. A Tribone pump?

2 Q. Uh-huh.

3 A. A Trabon pump?

4 Q. Trabon. Have you heard of a Trabon pump?

5 A. Yeah, I've heard of a Trabon --

6 Q. Have you --

7 A. -- pump?

8 Q. -- heard of a Tribone pump?

9 A. Huh-uh.

10 Q. I'm probably wrong in saying Tribone.

11 A. I'm sorry.

12 Q. Don't take my word for it. You've heard of

13 Tra --

14 A. My terminology --

15 THE REPORTER: One at a time, please.

16 THE WITNESS: I'm sorry.

17 Q. (BY MR. J. SHEPPARD) You have heard of Trabon
18 pump?

19 A. Trabon pump, yes, sir.

20 Q. That makes more sense.

21 How do you spell Trabon?

22 A. I --

23 Q. If you're forced to at a deposition.

24 A. Not my strong suit, but T-r-a-y-b-o-n.

25 Q. Okay.

James Hadley
July 13, 2017

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1 A. Trabon -- I mean, I don't know.

2 Q. What's your understanding of what a Trabon pump
3 is?

4 A. It pumps lube oil.

5 Q. What's --

6 MS. ASHCRAFT: Pumps what? I'm sorry.

7 THE WITNESS: Pumps lube oil.

8 MR. J. SHEPPARD: Lube oil.

9 THE WITNESS: Yeah.

10 Q. (BY MR. J. SHEPPARD) Which of these gauges or
11 sensors corresponds to the Trabon pump?

12 A. It's actually on the wall right here.

13 Q. Circle it and put a T above it, please.

14 A. (Witness complies.)

15 Q. If something's wrong with the Trabon pump, what
16 is that area you just circled and put a T over going to
17 do?

18 A. It lights up red.

19 Q. Can I see what you've done, make sure you've got
20 a good T?

21 Yeah. That will light up red.

22 What about these -- I'm holding it up. What
23 about these gauges down here?

24 A. Uh-huh.

25 Q. What do those do; do you know?

James Hadley
July 13, 2017

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1 A. That's just your wink -- winkies, they call them.
2 If you have a problem, they -- they flip.

3 MS. ASHCRAFT: John, could you put that
4 up --

5 A. They don't light up or nothing.

6 Q. (BY MR. J. SHEPPARD) Yeah, can you hold up
7 Exhibit 2 to your deposition, please.

8 A. Uh-huh.

9 Q. And turn it towards the camera. Hold it right in
10 front of your chest.

11 And I'm asking you: On the bottom
12 right-hand portion of this master panel --

13 MR. MARLATT: Yeah, don't -- I'm just trying
14 to --

15 Q. (BY MR. J. SHEPPARD) Yeah, those are -- you
16 called them winkies?

17 A. Yeah, they're -- that's what we call them,
18 winkies.

19 Q. Okay.

20 A. I mean, indicators --

21 Q. Yeah.

22 A. -- winkies. They trip green, red, green, red.

23 Q. Okay. But holding this up, all of these gauges
24 and panels are indicators and triggers that could set off
25 an alarm?

James Hadley
July 13, 2017

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1 MR. MARLATT: I'm going to object to the
2 form of the question. I think you're confusing him, John.
3 You're asking if the panel sets off the alarm. I don't --

4 Q. (BY MR. J. SHEPPARD) I mean --

5 MR. MARLATT: -- I think that's what's got
6 him confused.

7 Q. (BY MR. J. SHEPPARD) -- all of these gauges
8 and -- all of these gauges and indicators are --
9 on Exhibit 2 are measuring things that if they get out of
10 whack can set off an alarm?

11 A. Not everything on here is a -- an alarm, no.

12 Q. Okay. What on here is not a potential alarm?

13 A. You have your air compressor. I mean, you've got
14 several things that just are -- are monitoring for us, for
15 operator use only. It's not a -- a shut down or anything
16 like that.

17 Q. Okay. And you're pointing to these gauges at the
18 top?

19 A. Uh-huh.

20 Q. Down at the bottom, these little circles, they
21 look -- would these -- would these almost like windows --
22 are those windows?

23 A. No, they're --

24 Q. They're lights?

25 A. That is -- no, that is the winky, the indicator.

James Hadley
July 13, 2017

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1 Q. Okay. And it looks like we have three rows of
2 indicators?

3 A. Uh-huh.

4 Q. Yes?

5 MR. MARLATT: Say yes.

6 A. Yes, sir.

7 Q. (BY MR. J. SHEPPARD) And we have some of those
8 indicators that look like they're up above in these upper
9 rows, too, right?

10 A. Yes, sir.

11 Q. Okay. And you said those indicators turned red
12 or green?

13 A. Yes, sir.

14 Q. Green means good?

15 A. Yes, sir.

16 Q. But if they -- if they turn red, that means
17 that's the problem?

18 A. Yes, sir.

19 Q. And if those indicators turn red, an alarm will
20 sound?

21 A. Yes, sir.

22 Q. Okay. Who sets -- who sets the standards by
23 which those winkies are triggered?

24 A. Can you ask -- can you ask --

25 Q. Yeah.

James Hadley
July 13, 2017

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1 A. -- me that one more time, because I'm kind of
2 confused on what you're asking.

3 Q. Yeah, let me ask -- you have an air-conditioning
4 system at your house?

5 A. Yes, sir.

6 Q. Okay. And sometimes air-conditioning systems,
7 you can say I want to keep the temperature at 72, right?

8 A. Right.

9 Q. And the AC will stay off unless and until the
10 temperature gets to 72 and then it comes on, right?

11 A. Yes, sir.

12 Q. And it comes on because you went over to that AC
13 panel and you put in cooling at 72 --

14 A. Yes, sir.

15 Q. -- right?

16 These winkies and these gauges and all the
17 things that set off alarms, they start an alarm after
18 something happens, right?

19 A. Uh-huh.

20 Q. I want to know who determines what that thing
21 which happens, who determines that?

22 A. The government.

23 Q. The government? Okay.

24 And you follow what the government says?

25 A. Yes, sir.

James Hadley
July 13, 2017

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1 Q. Who actually does the programming of this with
2 those I call metrics, those standards?

3 A. I have no idea.

4 Q. Okay. Is there anything at the platform -- back
5 up.

6 Are there any alarms at the platform that go
7 off that require -- that require three minutes to respond
8 to?

9 A. Three minutes to --

10 Q. Approximately three minutes to respond to.

11 A. Not that I know of. I really don't know. I
12 couldn't tell you.

13 Q. Are there any alarms or triggers that require a
14 certain amount of time to respond to?

15 A. Repeat that again.

16 Q. Are there any alarms or triggers that require a
17 certain amount of time to respond to before there's a
18 shutdown or some other thing happens?

19 A. If we get a -- an alarm on the panel, it -- you
20 know, that's -- we want it to shut down.

21 Q. And I'm asking about the time. Are there any
22 alarms or triggers that go off and trigger an amount of
23 time before something happens?

24 MR. MARLATT: Objection to form. Vague.

25 MR. BROUSSARD: I'll join.

James Hadley
July 13, 2017

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1 A. I don't -- we have the -- the temp scanner
2 alarm --

3 Q. (BY MR. J. SHEPPARD) Uh-huh.

4 A. -- I mean, if it gets out of whack -- I mean, if
5 it's above or below a certain temperature, it will shut
6 down or it will alarm. Well, if it alarms and it goes up
7 too high or too low, it's going to shut down. That would
8 be the only time stamp -- I mean, if you have an alarm on
9 it, it's going to shut down.

10 Q. Does Fieldwood do any drills where they ask
11 employees to respond to an alarm in a certain amount of
12 time?

13 A. No, sir.

14 Q. No?

15 A. No.

16 Q. What's an ESD?

17 A. It's a ESD that shuts down a complete platform.

18 Q. Does Fieldwood drill on ESDs?

19 A. We test our components. We don't do a drill.

20 Q. You don't do any drills with employees of
21 responding to ESDs?

22 A. No.

23 Q. And when you're testing the ESD system, do you
24 test whether or not there is a shutdown after a certain
25 amount of time?

James Hadley
July 13, 2017

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1 A. Yes, sir.

2 Q. What's that amount of time?

3 A. Two minutes and 45 seconds.

4 Q. Okay. How often do you do that drill?

5 A. Once a month.

6 Q. Who participates in the drill?

7 A. Whoever's there, the mechanic's there or
8 production employees, not --

9 Q. Tell me what a mechanic does during an ESD drill.

10 MS. ASHCRAFT: I'm going to object as vague.
11 Is drill a term?

12 A. No, it's not part of a drill. It's -- he -- it's
13 a testing of our components --

14 Q. (BY MR. J. SHEPPARD) Tell me what --

15 A. -- once a month.

16 Q. Sorry. Tell me what the mechanic does during
17 that testing.

18 A. A lot of -- most of the time the mechanic's not
19 there, so -- but if he is, he goes in the compressor
20 building --

21 Q. Okay.

22 A. -- and he'll wait on us. Once we do our
23 shutdown, then he'll bring the unit back up. That's it.

24 Q. Okay. So you lost me. What unit will he bring
25 back up?

James Hadley
July 13, 2017

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1 A. The compressor. I'm sorry.

2 Q. He'll bring it back on line?

3 A. Yes, sir, fire it back up.

4 Q. Once a month, you guys do tests where you
5 initiate an ESD, and in 2 minutes and 45 seconds test
6 whether or not the compressor shuts down?

7 MR. MARLATT: Objection, misstates
8 testimony.

9 A. We do our monthly testing --

10 Q. (BY MR. J. SHEPPARD) Uh-huh.

11 A. -- every month and . . .

12 Q. And walk me through, if I'm starting an ESD test,
13 what do I actually do? What do you do? Are you the one
14 that runs the test?

15 A. It just depends. Sometimes I'm in the well bay,
16 sometimes I'm actually the one that's flipping the ESD.

17 Q. That's what I mean. Have you ever seen the movie
18 "Crimson Tide"?

19 A. Huh-uh.

20 Q. You haven't? You should watch it. It's a very
21 good movie. It's about, you know, nuclear weapons on
22 submarines, and these nuclear weapons have to be initiated
23 and someone has to turn a key in the captain's office as
24 well as turn a key in the weapon's office in order for
25 those weapons to be initiated.

James Hadley
July 13, 2017

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1 A. Uh-huh.

2 Q. So it's the kind of movie that revolves around
3 where is the key and who's doing what. That's what I'm
4 asking about an ESD.

5 Who does physically what to start the ESD
6 test?

7 A. An operator.

8 Q. What does that operator do?

9 A. He flips a ESD station.

10 Q. Where is that station located?

11 A. Got them located all over the platform.

12 Q. Does an alarm sound when he flips that switch?

13 A. Yes, sir.

14 Q. And everyone can hear it because it's that really
15 loud screeching noise?

16 A. Alarm -- alarm goes off.

17 Q. What is everyone supposed to do after that switch
18 is flipped?

19 A. Not everyone does anything. I mean, it's just a
20 production operations does something.

21 Q. What do they do?

22 A. They go to their -- I mean, they're -- when we're
23 doing ours -- monthly testing, everybody's there. We have
24 them in strategic places to bring -- to monitor and then
25 bring the platform back on line.

James Hadley
July 13, 2017

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1 Q. Okay. Where are those strategic places?

2 A. Panels, anything that you have to put in bypass
3 to bring on -- you know, to test or -- or bring it back
4 on. Monitor, I mean.

5 Q. Something at the master panel?

6 A. Yes, sir.

7 Q. Okay. If the mechanic's involved -- the
8 mechanic's at the master panel?

9 A. No, sir.

10 Q. Sometimes the mechanic's --

11 A. No, sir.

12 Q. The mechanic's never at the master panel?

13 A. Not at the master panel.

14 Q. Where is --

15 A. He's at the compressor panel.

16 Q. That's what I meant. Excuse me. I was using the
17 wrong term.

18 During these ESD tests, if the mechanic's
19 involved, he's strategically located at the compressor
20 panel?

21 A. Yes, sir.

22 Q. And other people are strategically located other
23 places to watch and monitor?

24 A. Yes, sir.

25 Q. During the test, does anyone do anything or do

James Hadley
July 13, 2017

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1 they just look at the panels?

2 A. They wait until, you know, everything shuts down
3 to make sure it shuts down, we go around and check
4 everything, and then we put things back in service and
5 come back on line with it.

6 Q. Okay. So someone flips -- flips the ESD switch,
7 this alarm sounds, and the test, if successful, requires a
8 shutdown in 2 minutes and 45 seconds?

9 A. Yes, sir.

10 Q. And during that test, the people who are
11 strategically located while this horn is blaring are
12 watching their panels?

13 A. Yes, sir.

14 Q. Do they do anything to those panels during that
15 test? For example, do they have to shut anything down or
16 is it all supposed to happen by itself?

17 A. It all happens by itself.

18 Q. Okay. Okay.

19 THE VIDEOGRAPHER: About five minutes left
20 on this tape.

21 MR. J. SHEPPARD: Let's take a break.

22 THE VIDEOGRAPHER: Going off the record,
23 12:32.

24 (Short recess.)

25 THE VIDEOGRAPHER: Going on record, 1:35.

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1 Q. (BY MR. J. SHEPPARD) Mr. Hadley, we've been
2 discussing the 2-minute, 45 -- 2-minute, 45-second
3 timetable during the ESD testing?

4 A. (Moving head up and down.)

5 Q. And the system has been programmed to shut down
6 the compressor after 2 minutes and 45 seconds during an
7 ESD test, correct?

8 A. Yes, sir. It shuts down everything.

9 Q. I was going to ask you that --

10 A. Sorry.

11 Q. -- as far as the compressor.

12 What else does it shut down?

13 A. It shuts down the entire platform, inlet and
14 outlet flows.

15 Q. What was that last part?

16 A. Inlet and outlet of the platform, anything coming
17 in, anything going out.

18 Q. Okay. So in addition to the compressor, what are
19 the major -- other major components that are shut down?

20 A. Major components, you said?

21 Q. Uh-huh. Generators?

22 A. I'm sorry?

23 Q. Generators.

24 A. Yes, generators. It shuts down pretty much
25 pipeline pumps, everything.

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1 Q. Anything else that you consider major?

2 A. Shutdown valves. Every shutdown valve on the
3 platform shuts.

4 Q. Who has programmed everything to shut down after
5 2 minutes and 45 seconds?

6 A. Can you ask that -- I mean, if I answer the
7 question like that, it's going -- who has programmed it, I
8 don't -- the way you're asking the question, it's -- it's
9 not -- I can't answer it that way. Can you ask it a
10 different way?

11 Q. Sure. What about the way I asked the question
12 makes it unanswerable?

13 A. Well, it's -- the ESD is a pneumatic-type deal.
14 Are you asking who put that logic in?

15 Q. Yes.

16 A. I have -- I mean, that -- that's been done way
17 before my time.

18 Q. Okay. And I was asking who put the logic in,
19 meaning who programmed the system to shut down at that.
20 What does pneumatic mean?

21 A. That is on the -- you have pneumatic and you
22 have -- it's air operated.

23 Q. Uh-huh.

24 A. All right. You got -- electronics are pneumatic.
25 I don't know the -- do you want to know the definition of

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1 pneumatic?

2 Q. Really just wondering what you meant by it.

3 A. That's -- pneumatics is the air -- that's what we
4 call air -- air-operated side terminology --

5 Q. Okay.

6 A. -- I guess.

7 Q. So the ESD system is air operated?

8 A. Yes, sir.

9 Q. And you're saying the word "air" like it --

10 A. Like air compressor.

11 Q. Air compressor?

12 A. Yes, sir.

13 Q. And --

14 A. Pneumatic -- that's why we call it pneumatic
15 where it's a little easier to judge.

16 Q. That system, which is operated by air, is set
17 somehow to shut down after 2 minutes and 45 seconds,
18 correct?

19 A. Yes, sir, you're -- are you -- you're still
20 talking about the instrument -- I mean, you're talking
21 about the ESD station?

22 Q. Correct.

23 A. ESD -- yeah.

24 Q. Okay. All right. And the logic come -- that
25 system, is it computer based somehow?

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1 A. No.

2 Q. Not all -- so it's all air operated --

3 A. Yeah.

4 Q. -- is your understanding?

5 But somehow it knows after 2 minutes and 45
6 seconds and it shuts everything down?

7 MR. MARLATT: Objection, mischaracterizes
8 testimony.

9 A. I'm not understanding your question the way
10 you're asking.

11 Q. (BY MR. J. SHEPPARD) Okay.

12 A. I mean, we have a master panel that does this.

13 Q. Uh-huh.

14 A. I mean, are you -- are you asking me -- I mean, I
15 don't -- if I answer the question the way you're ask --
16 asking it, I don't -- I don't have that answer.

17 Q. Let me go at it this way.

18 A. I don't -- I mean, I'm sorry.

19 Q. Let's use an example. If I'm going to make
20 popcorn, okay? Have you ever made popcorn in a microwave?

21 A. Yes.

22 Q. And what time do you set it for usually?

23 A. Whatever it says on the box.

24 Q. Okay. I usually did it for about three minutes,
25 okay?

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1 A. Okay.

2 Q. And I walk over to the microwave and I put in
3 three minutes and I hit start --

4 A. Right.

5 Q. -- right?

6 And if I were to ask you or myself: Who put
7 in the input -- who told the microwave to go on for three
8 minutes, the answer would be me, John Sheppard, I did --

9 A. Right.

10 Q. -- right?

11 So the ESD system is programmed somehow to
12 shut off after 2 minutes and 45 seconds, correct?

13 MR. BROUSSARD: Object to the form of the
14 question.

15 A. Yes, sir.

16 Q. (BY MR. J. SHEPPARD) And I'm wondering who --
17 who put that 2 minute and 45 second timetable into this
18 system.

19 MR. BROUSSARD: Objection --

20 MR. MARLATT: Objection --

21 MR. BROUSSARD: -- to the form of the
22 question.

23 MR. MARLATT: -- asked and answered.

24 A. I have no idea who put it in there.

25 Q. (BY MR. J. SHEPPARD) Okay. Do you know if it

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1 can be changed?

2 A. Yes, sir, I do.

3 Q. How do you know that?

4 A. I've been told it can be adjusted. I've never
5 done it.

6 Q. All right. Who told you it can be adjusted?

7 A. Linear Controls.

8 Q. Okay.

9 A. They -- whoever's -- yeah, Linear Controls.

10 Q. They're the ones who handle that?

11 A. Yes, sir.

12 Q. And Charles Anderson works for Linear Controls?

13 A. He's electrical -- electrician.

14 Q. With Linear Controls?

15 A. Yes, sir.

16 Q. Okay. Since the year 2000, has that ESD system
17 been set at 2 minutes and 45 seconds, as far as you know?

18 A. As far as I know.

19 Q. Now -- now I'm going to ask kind of a different
20 question, not who actually did it, but who made the
21 decision that the timetable should be 2 minutes and
22 45 seconds. Do you understand the difference?

23 A. The government -- I mean, are you asking the
24 question -- can you ask it one more time?

25 Q. Do you remember my microwave example?

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1 A. Yeah. Yes, sir.

2 Q. And I -- I put three minutes in on the system --

3 A. Right.

4 Q. -- and I hit start?

5 A. Right.

6 Q. Now, imagine if you told me to put in three
7 minutes. Are you with me?

8 A. Yes, sir.

9 Q. So now my question is about that part. Who made
10 the decision that the ESD system would shut down after 2
11 minutes and 45 seconds?

12 A. The government.

13 Q. All right. That's your understanding?

14 A. Yes, sir.

15 Q. All right. Remember when I -- going back to
16 Exhibit 2 to your deposition, that's called the compressor
17 panel, right?

18 A. Yes, sir.

19 Q. Are any of those switches, as far as you know,
20 programmed to shut down after 2 minutes and 45 seconds
21 when they're triggered?

22 MR. MARLATT: Objection, form, vague.

23 A. No.

24 Q. (BY MR. J. SHEPPARD) No.

25 So you don't --

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1 A. As far --

2 Q. As far as you know?

3 A. As far as I know.

4 Q. Okay. Do you know if that is possible? Is it
5 possible to -- for someone to go in and say, This switch
6 right here, if it turns red, I want there to be a shutdown
7 after 2 minutes and 45 seconds. Do you know if that's
8 possible?

9 A. I don't know if it's possible. But, no, sir, I
10 don't think so.

11 Q. Okay. Who would that be a question for, Linear
12 Controls?

13 A. I guess so.

14 Q. On the master panel, are there any gauges,
15 switches, triggers, whatever, that are programmed to shut
16 down after 2 minutes and 45 seconds?

17 A. The -- the only thing we got is the ESD side of
18 it.

19 Q. Uh-huh.

20 A. It -- it drips out, but it drips out at -- it
21 don't have a switch on it, it just has a palm valve.

22 THE REPORTER: A what valve?

23 THE WITNESS: A valve, a palm valve.

24 Q. (BY MR. J. SHEPPARD) Does the master panel look
25 different than the compressor panel?

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1 A. Yes, sir.

2 Q. Is it bigger?

3 A. Yes, sir.

4 Q. Does it have more gauges?

5 A. It has more everything.

6 Q. It has gauges for everything on the platform?

7 A. Well, you have your different systems, you know,
8 your ESDs, your -- every component, you know, PSLs, all
9 that.

10 Q. What's PSL?

11 A. Pressure safety low.

12 Q. Okay. At the master panel, there would be gauges
13 and switches for the generators, correct?

14 A. Yes, sir.

15 Q. The pump valves?

16 A. Yes, sir.

17 Q. Everything?

18 A. Yes, sir.

19 Q. Okay. Does the ESD system, is it labeled with
20 the letters ESD?

21 A. Yes, sir.

22 Q. And how many -- how many -- and is that only at
23 the master panel where there is an ESD-labeled area?

24 MR. MARLATT: Objection, form. Vague.

25 A. No.

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1 Q. (BY MR. J. SHEPPARD) Where are the other areas
2 where there are ESD components?

3 A. They're all over the platform. You have them all
4 over.

5 Q. It can be triggered from multiple areas?

6 A. Right.

7 Q. Is it with a switch or is it a key?

8 A. Switch -- or a valve.

9 Q. It's a valve?

10 A. On -- open and close.

11 Q. Is there one here on the compressor panel?

12 A. Not a ESD.

13 Q. What is -- is there anything similar to it?

14 A. Yes, there's two of them, actually (indicating).

15 Q. What are you pointing to?

16 A. Three of them.

17 Right here's a valve, a three-way valve.

18 Q. Uh-huh.

19 A. And right there.

20 Q. What do those valves do that you just pointed to?

21 A. The first one that -- that bypasses your lows,
22 like, they call it a Class C on a panel, all your pressure
23 safety lows. This one is for the temp scanner, the one on
24 the left that we -- you made me circle and put 1, 2 on.

25 Q. Uh-huh.

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1 A. That one bypasses it.

2 Q. What do those switches do? I don't get what they
3 bypass. What do you mean?

4 A. You -- the -- they're just three-way valves when
5 you -- you -- either on or off, you're in service or in
6 bypass. When you put it in bypass, it will keep it from
7 shutting -- going into a shutdown sequence.

8 Q. Okay. So those -- and I want to -- let's circle
9 those three -- what do you call them, three-way valves?

10 A. Yes, sir.

11 Q. And circle them. And I want you to put a B over
12 them for bypass.

13 A. (Witness complies.)

14 There's only two of them that bypass
15 anything. The other one is just check your scavenger air.
16 It just goes over and back. It don't bypass nothing.

17 Q. Okay. Write a B over the ones that bypass.

18 A. (Witness complies.)

19 Q. Those switches that you just wrote a B over, they
20 prevent the compressor from shutting down if they are
21 turned?

22 A. Yes, they -- because I think you kind of -- can
23 you ask that a little different? Because that's really
24 open-ended right there.

25 Q. Uh-huh.

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1 A. If you -- I mean, they have a specific shutdown.

2 If you bypass it, it won't go down on that.

3 Q. Got it. That's what I meant.

4 A. The way -- you know, these two are totally

5 different. One's temperature and one's pressure.

6 Q. Okay. The one that you circled and put a B on on

7 the left side of the page, that's temperature?

8 A. You're talking about this one -- this one?

9 Q. Correct.

10 A. That's pressure.

11 Q. That's pressure?

12 A. Yeah.

13 Q. And the -- the one that you circled and put a B

14 over on the right side of the page is temperature?

15 A. Temperature.

16 Q. And if the compressor is on its way to shutting

17 down because of pressure and you turn that valve, that

18 will bypass that and it won't shut down because of

19 pressure?

20 A. If it's on its way to shutting down, it's going

21 to shut down.

22 Q. What if --

23 A. You can't stop it.

24 Q. What if you turn it right before it starts?

25 A. You can't stop it once it starts. I mean, if

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1 it's at a low pressure, it's going to shut down.

2 Q. If you turn it before that shutdown starts, that
3 will bypass that process?

4 A. Right.

5 Q. Okay. So if you get to it quick enough, you can
6 stop the shutdown?

7 MR. BROUSSARD: Object to the form.

8 A. I really don't know, because I've never -- I've
9 never done that.

10 Q. (BY MR. J. SHEPPARD) And the other one, the
11 temperature, you can flip that, and if it hasn't started
12 to shut down, you can stop it from shutting down because
13 of temperature, correct?

14 A. I suppose, yes.

15 Q. But you have to get to it before it starts that
16 process --

17 MR. BROUSSARD: Object to the form of the
18 question.

19 Q. (BY MR. J. SHEPPARD) -- correct?

20 A. That's actually -- I mean, I don't know what
21 you're --

22 MS. ASHCRAFT: Objection, speculation. He
23 said he didn't know.

24 A. Can you ask that different --

25 Q. (BY MR. J. SHEPPARD) Sure.

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1 A. -- please?

2 Q. Sure. You said earlier that if the shutdown
3 process has already started, you cannot stop it by turning
4 these B switches that we've labeled B, correct?

5 A. Right.

6 Q. All right. So if you get to these switches
7 before the shutdown has started, you can bypass the
8 shutdown, correct?

9 MR. BROUSSARD: Object to the form of the
10 question.

11 MS. ASHCRAFT: Object, mischaracterizes the
12 evidence. Objection, speculation.

13 A. No, you can't -- you can't stop this. I mean,
14 once it started, it stop.

15 Q. (BY MR. J. SHEPPARD) I'm saying before it
16 starts, if you get to that switch --

17 A. You're not going to -- I mean, that's what I'm
18 saying, you're not going to go in there to switch it
19 unless it's started. I mean, unless you have a problem or
20 you're in there balancing it, you're not going to switch
21 -- flip that switch.

22 Q. When would you flip that switch?

23 A. When you're balancing it or if you doing your
24 report and you see a problem --

25 Q. Uh-huh.

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1 A. -- you flip the switch, you monitor it, and the
2 mechanic will do his thing.

3 Q. And you flip the switch to prevent that shutdown
4 process from beginning?

5 MR. BROUSSARD: Object to the form, asked
6 and answered.

7 MS. ASHCRAFT: Mischaracterizes the
8 evidence --

9 A. I don't --

10 MS. ASHCRAFT: -- speculation.

11 Q. (BY MR. J. SHEPPARD) If you don't know, you
12 don't know.

13 A. I don't know. I really don't know.

14 Q. Have you ever flipped those switches?

15 A. I've flipped those switches.

16 Q. Why did you flip those switches?

17 A. To by -- bypass it so I could balance
18 the compressor.

19 Q. What were you bypassing?

20 A. The temperature scanner.

21 Q. Okay. And bypassing a shutdown?

22 MR. BROUSSARD: Object to the form.

23 MR. MARLATT: Object to the form,
24 mischaracterizes the evidence.

25 A. You have to bypass it to balance it.

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1 Q. (BY MR. J. SHEPPARD) Okay. If the shutdown has
2 started, flipping that switch will not prevent a
3 shutdown --

4 A. No.

5 Q. -- correct?

6 A. Correct.

7 Q. Okay. Are those switches labeled "bypass"? What
8 are they labeled?

9 A. They're labeled temperature scanner and low
10 pressure header -- low pressure available gas --

11 Q. Uh-huh.

12 A. -- and then you have one below it says in service
13 or bypass on both of them.

14 Q. Got it. I've been using the 2 minutes and 45
15 second timetable for a lot of questions, correct?

16 A. Yes, sir.

17 Q. I want to make it broader. I want to ask you if
18 there are any gauges, winky valves, alarms on any of the
19 panels that are timed to shut down after any period of
20 time; not just 2 minutes and 45 seconds, any period of
21 time.

22 A. The only one I know that's got a timer is the
23 pipeline pump.

24 Q. Okay. What's the timer on that one?

25 A. Two minutes, I believe.

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1 Q. How does that work? After 2 minutes if it's not
2 tended to, the pipeline pump will shut down?

3 A. Yeah.

4 Q. Yes?

5 A. It's -- it's only set up on like a low pressure
6 to where if it don't have the correct amount of flow, it
7 will shut down.

8 Q. Where is the pipeline pump gauge located?

9 A. At the master panel.

10 Q. At the master panel?

11 A. Yes, sir.

12 Q. Anywhere else?

13 A. That's it.

14 Q. Okay. So if you've got a pipeline pump issue, if
15 it's not addressed in two minutes, the pipeline pump shuts
16 down?

17 A. Yes, sir.

18 Q. Does anything else shut down?

19 A. No, sir.

20 Q. All right. Anything else that is timed to do
21 something after a certain amount of time?

22 A. Not that I know of.

23 Q. All right. Does Waukesha-Pearce have a
24 mechanical integrity program?

25 A. I have no idea.

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1 Q. Do you know what that is?

2 A. No, sir.

3 Q. Have you ever seen a document that says, this is
4 how we're going to take care of the compressor?

5 A. No, sir.

6 Q. Do you know what I mean?

7 A. No, sir.

8 Q. You have not seen any document, any policy,
9 anything put together by Waukesha-Pearce or anyone else
10 saying, this is how we're going to maintain the compressor
11 and here are the standards that we're going to keep the
12 compressor at, anything like that?

13 A. Nope.

14 Q. Okay.

15 (Exhibit 3 marked.)

16 Q. (BY MR. J. SHEPPARD) I'll show you Exhibit 3 to
17 your deposition. Have you ever seen this document before?

18 A. Yeah -- yes.

19 Q. When did you see this document?

20 A. The day that it was filled out.

21 Q. Who filled it out?

22 A. Marty.

23 Q. You -- a medic filled this out?

24 A. Yes, sir.

25 Q. Okay. So let's look at this factual description.

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1 A. Uh-huh.

2 Q. And did you discuss the injuries Mickey Raicevic
3 was suffering on December 1st with Marty?

4 MS. ASHCRAFT: Objection --

5 MR. MARLATT: Objection, form.

6 MS. ASHCRAFT: -- mischaracterizes the
7 evidence.

8 THE REPORTER: Wait. I'm sorry, I didn't
9 hear --

10 MS. ASHCRAFT: Objection, mischaracterizes
11 the evidence.

12 Q. (BY MR. J. SHEPPARD) On December 1st, 2014, you
13 saw this document?

14 A. Yes.

15 Q. Who gave you this document?

16 A. It was e-mailed back to me from the medic.

17 Q. Marty?

18 A. Marty.

19 Q. Did you discuss it with Marty?

20 A. Marty was at the location when this was -- I
21 mean, he's -- he was the one that filled it out, and then
22 he's the one that done it, not me.

23 Q. Do you remember what my question was?

24 A. Nope.

25 Q. Okay. Listen to the question.

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1 MR. MARLATT: Listen to his questions,
2 please.

3 Q. (BY MR. J. SHEPPARD) Did you discuss this with
4 Marty?

5 A. Yes.

6 Q. All right. Where did you discuss it with Marty
7 on December 1st, 2014?

8 MR. MARLATT: Objection, form,
9 mischaracterizes the testimony.

10 A. We discussed -- in the living quarters, I
11 mean . . .

12 Q. (BY MR. J. SHEPPARD) Did he tell you about the
13 things that he wrote here -- in here on the bottom of
14 Exhibit 3 to your deposition?

15 A. Yes, sir.

16 Q. What did you say back to Marty?

17 A. I didn't say nothing back to him, because I
18 was -- when -- when we was -- he was doing this, I was
19 right here. That's what I'm saying, we discussed it in
20 the living quarter's office, whatever you want to call it,
21 while he was doing this.

22 Q. Did he have all the information to go in this
23 form or did you give him some of the information?

24 A. I relayed some of the information, yes, sir.

25 Q. What information did you relay to Marty?

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1 A. I couldn't -- I don't remember what I relayed. I
2 had a man asking one person a question and then bringing
3 it to me, and I give it to Marty.

4 Q. Tell me who these men are. Men asked you a
5 question. Who's that?

6 A. Uriah Langston, I believe, was going up and down
7 the stairs trying to help out with the information,
8 because at the time, Mr. Mickey couldn't -- couldn't come
9 down stairs, he couldn't go anywhere. His back was
10 bothering him or whatever. So we had to relay
11 information, and that was it.

12 Q. Okay. Now, earlier I asked you if you had ever
13 discussed Mickey's injuries with anyone, and you said no.
14 Do you remember that?

15 A. Yes, sir.

16 Q. Okay. So I want to be -- it's kind of an
17 important issue, so I want to be specific. You did
18 discuss Mickey injuries at least on December 1st, 2014,
19 right?

20 MR. J. SHEPPARD: Object to the form of the
21 question.

22 A. I discussed --

23 THE REPORTER: Please wait.

24 MR. BROUSSARD: It mischaracterizes the
25 prior question that was asked of the witness.

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1 Q. (BY MR. J. SHEPPARD) You can answer.

2 A. I discussed this right here.

3 Q. Okay.

4 A. I didn't discuss any --

5 Q. So you --

6 A. -- info.

7 Q. -- discussed on December 1st, 2014, that Mickey
8 woke up and back was inflamed. Do you see that?

9 MR. MARLATT: Objection, form,
10 mischaracterizes the testimony.

11 A. Yeah.

12 Q. (BY MR. J. SHEPPARD) Okay. Because that's what
13 the words on the page say, "Mickey woke up and back was
14 inflamed," correct?

15 A. That's what Mickey give to the operator to -- I
16 mean, that's the information he gave.

17 Q. Okay. Who did he give that to, Uriah Langston?

18 A. I -- I can't honestly answer that. I mean, I
19 don't -- I really don't know if that was me he give that
20 to or what. I mean, because there's more -- more than one
21 process, you know, when you're filling this out and you
22 got a man sitting there like that waiting on an ERA bird.

23 Q. Okay. Yeah, I'm just --

24 A. You know.

25 Q. If -- if you can't --

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1 A. I can't honestly answer it. I'm sorry.

2 Q. Mickey could have told you that he woke up and
3 his back was inflamed?

4 A. Right, he could have.

5 Q. And he could have told Uriah Langston that he
6 woke up and his back was inflamed?

7 A. Either -- either way, yes, sir.

8 Q. And he could have told the medic that he woke up
9 and his back was inflamed?

10 A. Could have.

11 Q. Okay. What we do know, you do remember that you,
12 Uriah Langston, and the medic were involved in gathering
13 information or -- or putting information into this form?

14 MR. MARLATT: Objection, form,
15 mischaracterizes --

16 Q. (BY MR. J. SHEPPARD) Is that fair?

17 MR. MARLATT: -- the prior testimony.

18 A. Yeah.

19 Q. (BY MR. J. SHEPPARD) Is there anyone else you
20 remember participating in that?

21 A. No.

22 Q. Did Mickey ask to be transported off the platform
23 in a boat or vessel?

24 A. I -- I don't -- I don't think so, no.

25 Q. Okay.

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1 A. I don't remember him saying anything about no
2 boat, because he was wanting to get to -- get some relief
3 is what he kept saying. He couldn't get on our bird is
4 what it was.

5 Q. If Mickey requested to be taken off by a boat
6 because he didn't want to go into a small helicopter,
7 would that request have been honored?

8 MS. ASHCRAFT: Objection, speculation.

9 A. There have been so many different characteristics
10 to go, I couldn't answer that.

11 Q. (BY MR. J. SHEPPARD) It might not be honored?

12 A. Right.

13 Q. What are some of the reasons why that request
14 would not be honored?

15 MS. ASHCRAFT: Objection --

16 MR. MARLATT: Objection --

17 MS. ASHCRAFT: -- speculation.

18 A. Sea conditions, wind, weather. You know.

19 Q. (BY MR. J. SHEPPARD) Have you ever denied a
20 request by someone who is injured in the manner in which
21 they want to be evacuated?

22 A. No.

23 Q. Do you try to honor those requests?

24 A. I've never -- never had no situation like that.

25 Q. Is this -- is Mickey the only person that had to

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1 be evacuated from a platform in your career?

2 A. No.

3 Q. Who else has had to be evacuated?

4 A. Myself.

5 Q. Were you injured?

6 A. I had kidney -- I had kidney stones.

7 Q. Okay. When was that?

8 A. 2001, I believe.

9 Q. How were you evacuated?

10 A. Helicopter.

11 Q. Did you make a recovery?

12 A. Yes, sir.

13 Q. Obviously.

14 Has anyone suffered an injury at the

15 Mp 153 B?

16 MR. MARLATT: Objection, form, vague.

17 A. Can you rephrase -- I mean, can you ask that
18 different? I mean --

19 Q. (BY MR. J. SHEPPARD) What do --

20 A. -- are you --

21 Q. -- need me to rephrase on that?

22 A. I mean, if I say no under my watch or my 14 days
23 I'm out there? Is that what you're meaning?

24 Q. I asked ever that you're aware of.

25 A. Yeah, there's been people got hurt there.

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1 Q. Who's been injured?

2 A. I couldn't tell you their names.

3 Q. You don't remember anyone that was injured out
4 there?

5 A. Not right here off the top of my head I don't.

6 Q. When did those injuries occur?

7 A. Two of them was '97 before I was there.

8 Q. How --

9 A. There was just --

10 Q. -- did you know about them?

11 A. They was in a report that I read.

12 Q. When did you read that report?

13 A. In '98.

14 Q. Were they killed?

15 A. Sir?

16 Q. Were they killed?

17 A. Yes, sir.

18 Q. What other injuries are you aware of?

19 A. None off the top of my head right now. I can't
20 think of any anyways.

21 Q. Has anyone been injured on your watch?

22 A. No, huh-uh.

23 Q. Back to Exhibit 3 to your deposition, did you
24 review the information that went into this form before it
25 was finalized?

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1 A. Yes, sir.

2 Q. And this is a Fieldwood Energy incident report,
3 correct?

4 A. Yes, sir.

5 Q. Did you say "yes, sir"?

6 A. Yes, sir.

7 Q. Have you ever seen a copy of your job
8 description?

9 A. My what now?

10 Q. Have you ever seen a copy of your job
11 description?

12 A. My job description.

13 Q. Do you have a written job description?

14 A. My -- I'm not understanding what you're asking.

15 Q. Do you know what a job description is?

16 A. Yeah, I know --

17 Q. Okay. Do you --

18 A. -- what a job description is.

19 Q. Do you have a written job description?

20 A. I think we may be calling -- thinking of two
21 different things. We have a PIC-type deal. I mean, it's
22 not called a job description.

23 Q. Okay. What's it called?

24 A. That I -- that I know of.

25 Q. Okay. What -- what are you referring to? What's

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1 it called?

2 A. Training -- PIC manual.

3 Q. How big is the manual?

4 A. (Indicating) yea big. It's --

5 Q. Hold up your finger.

6 A. (Indicating.)

7 Q. And what's it called, the PIC manual?

8 A. I don't exactly know the -- I mean, I hadn't -- I
9 don't look at it every day, so . . .

10 Q. But it tells you what as a PIC you're supposed to
11 do?

12 A. What -- right, what your job consists of, what
13 you can, you know . . .

14 Q. Where -- where do you keep that -- is it a
15 binder?

16 A. Yes.

17 Q. Where do you keep that?

18 A. I have one in my locker, and we have it on SEMS.

19 Q. On S-E-M-S, SEMS?

20 A. Yes -- yes, sir.

21 Q. You can access that online?

22 A. Yes, sir.

23 (Exhibit 4 marked.)

24 Q. (BY MR. J. SHEPPARD) I'm going to hand you
25 Exhibit 4 to your deposition. Have you ever seen that

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1 document before?

2 A. Yes, sir.

3 Q. When's the last time you saw this document?

4 A. It's been a little while.

5 Q. Two years, five years?

6 A. Probably two years, three years. I haven't
7 reviewed it in a while.

8 Q. Okay. I want you to take a minute to review this
9 and tell me if there's anything in here that you disagree
10 with that you think that's not in my job description.

11 A. I made a mistake anyways. This is -- this is --
12 whenever we hired on with Apache is when we went through
13 the PIC training --

14 Q. Uh-huh.

15 A. -- and we haven't been through the PIC training
16 with Fieldwood.

17 Q. Okay.

18 A. So this is the -- I don't recall this one until
19 Fieldwood. As far as the person in charge, operator lead
20 and operator senior, it's been about four or five years
21 since I've looked at this.

22 Q. Okay.

23 A. Or whenever I hired on with Fieldwood.

24 Q. Okay. Is there anything in here that you
25 disagree with that you say, no, that's not part of my job

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1 description?

2 A. I haven't read the whole thing, but if it's in
3 here, it's part of my job description, I guess.

4 Q. Do you actually ever remember seeing this
5 document?

6 A. Yep, either this one or something similar.

7 Q. Okay.

8 A. I mean . . .

9 Q. Take your time. I want you to look at it all and
10 tell me if there's anything in here that you disagree with
11 that is not in your job description.

12 A. (Witness reading.)

13 Can you repeat your question again?

14 Q. Is there anything in Exhibit 4 that you disagree
15 with and believe is not part of your job description?

16 A. No.

17 Q. Did --

18 A. I don't disagree --

19 Q. -- you say no?

20 A. I don't disagree with --

21 Q. Stated --

22 A. I don't see anything I disagree with.

23 Q. Stated otherwise, everything in Exhibit 4 is part
24 of your job description, correct?

25 A. Yes, sir.

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1 Q. All right.

2 (Exhibit 5 marked.)

3 Q. (BY MR. J. SHEPPARD) Let me hand you Exhibit 5
4 to your deposition. Have you seen Exhibit 5 to your
5 deposition before?

6 A. (Moving head up and down.)

7 Q. Yes?

8 A. Yes, sir, I've seen it.

9 Q. What is Exhibit 5 to your deposition?

10 A. A daily compressor report.

11 Q. Are there other daily reports that are generated
12 at the platform?

13 A. Yes, sir.

14 Q. Is there a daily generator report?

15 A. No, sir.

16 Q. Are there any daily reports that look like
17 compressor reports for something else at the platform?

18 A. No, sir.

19 Q. What are the other daily reports that are
20 generated that you just referenced?

21 A. We have a morning report, daily morning report.

22 Q. What's the daily morning report look like?

23 A. It just -- it just has your numbers on it, your
24 oil numbers, your gas numbers.

25 Q. Is it one sheet of paper or multiple?

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1 A. Well, we have three -- three sheets of paper,
2 because we gather the information from A and C and -- and
3 put it on there with B and send it in to the foreman every
4 morning.

5 Q. Send it in to where?

6 A. To the foreman, production foreman.

7 Q. Your production foreman?

8 A. Yes, sir.

9 Q. Do you send it?

10 A. Not every morning, no, sir.

11 Q. Either you or one of the operators?

12 A. Yes, sir.

13 Q. Via e-mail?

14 A. Yes, sir.

15 Q. Okay. And you said for you -- we collect for A,
16 B, and C. Those are the different platforms?

17 A. Yes, sir, 65-A and --

18 Q. Do those reports contain --

19 A. -- (inaudible).

20 THE REPORTER: Wait. I'm sorry. Repeat
21 those again.

22 THE WITNESS: 65-A and 153-C.

23 THE REPORTER: Thank you.

24 Q. (BY MR. J. SHEPPARD) So the three platforms that
25 go into those morning reports are the 153-B, the 153-C,

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1 and the 65-A?

2 A. Yes, sir.

3 Q. And they contain metrics regarding gas and things
4 like that?

5 A. Yes, sir.

6 Q. Do they contain any reference to daily
7 activities?

8 MR. MARLATT: Objection, form. Vague.

9 A. It's got a small, little spot where you put, you
10 know, important downtime or something like that,
11 compressor down, just a small description of it, no daily
12 activity log or anything on it.

13 Q. (BY MR. J. SHEPPARD) What other kind of things
14 are in that box, downtime? What if someone's injured?

15 A. Excuse me?

16 Q. What if someone's injured or -- or evacuated?
17 Would that be reflected?

18 A. I don't believe on that, no.

19 Q. Okay. What about if someone observed leaks?

20 MS. ASHCRAFT: Objection, speculation.

21 A. No, not on that one.

22 Q. (BY MR. J. SHEPPARD) What about -- specific if
23 someone saw the compressor leaking, not necessarily into
24 the Gulf of Mexico either, but leaking or spraying oil,
25 would that be reflected in the morning reports?

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1 A. No. No.

2 Q. Okay. That kind of information is -- those
3 reports are not designed for that kind of information?

4 A. Right.

5 Q. Nothing would prevent you from putting that in,
6 but you can put that in that box?

7 A. Yeah.

8 Q. Correct?

9 A. Yes, sir.

10 Q. Where -- where are all the reports that evidence
11 of leaks show up in?

12 MR. MARLATT: Objection, form. Vague.

13 A. Can you -- I mean, are you asking about a -- the
14 compressor leak or --

15 Q. (BY MR. J. SHEPPARD) For example, there's a spot
16 on these reports for leaks. Are you aware of -- of that?

17 A. It's been several years since I've even looked at
18 those.

19 Q. I'll represent to you there's a spot in Exhibit 5
20 for leaks, okay?

21 A. Right. Okay.

22 Q. And this pertains to the compressor.

23 A. Right.

24 Q. I want to talk about other types of leaks.

25 A. Okay.

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1 Q. Are there reports for the platform that reflect
2 other types of leaks?

3 A. No, not that I know of. The mechanical group,
4 you know, handles that. I'm not --

5 Q. Did you know that -- you don't know that
6 Exhibit 5 has a spot for leaks?

7 A. Well, I mean, I'm quite sure I did, but I haven't
8 filled this out or even opened it in, you know, several
9 years.

10 Q. Okay. And that's why I asked if there are other
11 reports. For example, is there a daily generator report?

12 A. No.

13 Q. Is there a daily pipeline pump --

14 A. We --

15 Q. -- report?

16 A. We do a two-hour round sheet. That's a -- that's
17 the only other report-type deal that we do. Every two
18 hours, we go around and -- and check and write down
19 pressures, and if anything's leaking, it's on there.

20 Q. Okay. Got it. Two-hour round sheets?

21 A. Right.

22 Q. They're called the round sheets?

23 A. That's -- yes, sir.

24 Q. You fill those out?

25 A. My operators do, yes, sir.

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1 Q. As well as you?

2 A. Sir?

3 Q. Do you do that as well?

4 A. I have. Yes, sir.

5 Q. When's the last time you filled out a daily round
6 sheet?

7 A. Probably about five months ago.

8 Q. All right. How often do you do it personally?

9 A. Not very often.

10 Q. Like, every five months?

11 A. No. I mean, they -- I don't fill the daily round
12 out, but I make my own round, you know.

13 Q. Do you make notations of your rounds?

14 A. If I have a problem, yes, sir, I do.

15 Q. Where do you write those down?

16 A. E-mail, daily activities, logs.

17 Q. What's the --

18 A. Or daily -- daily activity. I think -- I
19 think -- I think that's it, daily activity report, maybe.

20 Q. What is a daily activity report?

21 A. This is where we write our notes on anything
22 important if you've got a leak or something.

23 Q. So we've got the daily compressor reports, one
24 type of report, correct?

25 A. Uh-huh.

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1 Q. We have the daily activity report --

2 A. Yes, sir.

3 Q. -- another type, correct?

4 A. Yes, sir.

5 Q. We have the daily rounds, another type of report?

6 A. No, it's a two-hour round.

7 Q. Two-hour round?

8 A. Yes.

9 Q. Different type of report --

10 A. Right.

11 Q. -- correct?

12 Are the daily rounds handwritten?

13 A. Yes, sir.

14 Q. Do they then get inputted into the computer?

15 A. Wait a minute. I think I misunderstood you. Are
16 you talking about the two-hour rounds or the daily --

17 Q. Two-hour --

18 A. -- activity?

19 Q. Two-hour rounds.

20 A. They're never put in the computer.

21 Q. Okay. They're handwritten?

22 A. Handwritten. That is -- our production
23 operations own -- I mean, we don't -- it's not required by
24 the company.

25 Q. Where do they keep those?

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1 A. We keep them in the office for our hitch, and
2 then they pretty much either store it in the trash can or
3 they put it in a -- in a file.

4 Q. Okay. What file?

5 A. The filing cabinet in the office.

6 Q. Okay. Have there ever been leaks at the
7 compressor ever?

8 A. Oh, yeah. Yes, sir.

9 Q. Since 2011, have there been any leaks at the
10 compressor?

11 A. Yes, sir.

12 Q. Dozens?

13 A. I wouldn't be able to say dozens. I mean, we've
14 had leaks. You know, it's an -- old equipment.

15 Q. It's what?

16 A. Old equipment.

17 Q. How old is the compressor?

18 A. I don't know exactly. I know it was there way
19 before I got there.

20 Q. 40 years old or more?

21 A. Probably.

22 Q. In that compressor room, is it just a compressor
23 or is there other machinery in there?

24 A. There's a air compressor. That's it.

25 Q. Okay. So there's a -- what's the -- so there's a

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1 air compressor and what else, a gas compressor?

2 A. Yes, sir.

3 Q. Okay. Anything else?

4 A. No, sir.

5 Q. Is the only thing that can leak oil in the
6 compressor building the gas compressor?

7 A. No, sir.

8 Q. Does the air compressor also run on oil?

9 A. Yes, sir.

10 Q. Okay. Anything else in there that runs on oil
11 that you know of?

12 A. No, sir.

13 Q. Okay. Now, I gotta go back to that part where
14 you told me you never discussed the Raicevic incident,
15 okay?

16 A. Yes, sir.

17 Q. You did discuss it on December 1st, 2014,
18 correct?

19 MR. BROUSSARD: Object to the form of the
20 question.

21 A. I -- yes, sir.

22 Q. (BY MR. J. SHEPPARD) Okay. Did you remember
23 that during a break or it just came up naturally here?

24 MR. MARLATT: Object to the --

25 MR. BROUSSARD: Object to the form --

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1 MR. MARLATT: -- form of the question,
2 because your earlier question --

3 MR. BROUSSARD: It's argumentative.

4 MR. MARLATT: -- your earlier question was
5 not -- it didn't -- it didn't implicate that conversation.

6 Q. (BY MR. J. SHEPPARD) You can answer.

7 A. I don't know how to answer that question. Can
8 you redirect -- can you reask that question?

9 Q. Okay. Let me ask you this: You did discuss
10 Mickey Raicevic's injury on December 1st, 2014 --

11 MS. ASHCRAFT: Objection --

12 Q. (BY MR. J. SHEPPARD) -- correct?

13 MS. ASHCRAFT: -- mischaracterization.

14 A. I didn't --

15 MR. MARLATT: Objection, mischaracterizes
16 the evidence.

17 A. I didn't discuss his injuries. I discussed his
18 information to get him help --

19 Q. (BY MR. J. SHEPPARD) Okay.

20 A. -- not no injuries.

21 Q. For his back?

22 A. For his back.

23 Q. Okay. After December 1st, 2014, have you ever
24 discussed Mickey Raicevic's back or the incident since
25 then besides with your lawyer?

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1 A. No.

2 Q. Okay. Can we lock that in 100 percent sure?

3 A. Yes, sir, because I haven't talked to nobody
4 about anybody, I mean, about nothing.

5 Q. All right. Okay. So the only day that you're
6 discussing Mickey Raicevic and his back and what did or
7 did not happen on December 1st, 2014, was December 1st,
8 2014, fair, with -- with the exception of your lawyers?

9 A. Yes.

10 Q. All right. What is Fieldwood's policy for when
11 compressor shutdowns need to be recorded?

12 A. I'm not understanding your question.

13 Q. Actually, I need your help with some terminology
14 here. Is a shutdown different than a shut-in?

15 A. You got your component shutdown, you know, where
16 the compressor just shuts down on its own --

17 Q. Uh-huh.

18 A. -- or, you know, has a problem and it shuts down,
19 or you have a production -- LP separator shuts it. You
20 know what I'm saying? It's --

21 Q. Uh-huh.

22 A. -- two different type, process shut-in same --

23 Q. Okay.

24 A. Is that the question?

25 Q. Yeah. What's something that can shut down the

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1 production but not the compressor?

2 A. The test separator.

3 Q. Test separator?

4 A. Yes, sir.

5 Q. Okay. Let's say the test separator shuts down,
6 okay?

7 A. Uh-huh.

8 Q. With me?

9 A. Yes, sir.

10 Q. Production will stop, correct?

11 A. Not for everything.

12 Q. Not for everything?

13 What does it continue for?

14 A. Everything but the well that's in test.

15 Q. How many wells are there?

16 A. We got nine now.

17 Q. All on that platform?

18 A. Yeah.

19 Q. I didn't know that. Okay.

20 And does each have its own test separator?

21 A. No, sir.

22 Q. Okay. But that can affect just one well. Okay.
23 The others will go on.

24 If the compressor shuts down, will all nine
25 wells stop producing?

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1 A. Yes, sir.

2 Q. You need the compressor to do production?

3 A. Yes, sir.

4 Q. And it affects all nine wells at the Mp 153 B?

5 A. Yes, sir.

6 Q. Got it. What -- if the compressor shuts down for
7 one minute, does that need to be recorded and documented
8 at Fieldwood?

9 A. No.

10 Q. What's the time that a compressor needs to be
11 shut down before it must be recorded?

12 A. If we shut down, we call our foreman and tell
13 him, hey, look, we shut down. This is what happened.
14 This is what we done. We're back online. No matter what
15 the time frame is, if it's ten minutes.

16 Now, a minute -- if it goes down -- if I
17 cause it to go down because I've done something, you know,
18 we break and brought back up, we don't have to report
19 that. But if it's down for -- if it's going to be down
20 for a good -- you know, a little while, we report it to
21 our foreman.

22 Q. I'm talking about documented in writing. Did you
23 see this --

24 A. Oh, morning --

25 Q. -- compressor report?

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1 A. Morning report.

2 Q. Okay. You see this compressor report, Exhibit 5?

3 A. Yes, sir.

4 Q. And you see there's that second section that
5 says, "Daily compressor run hours, run time downtime"?

6 A. Yes, sir.

7 Q. If it's down for half an hour, does that need to
8 be reflected on this form?

9 A. It goes in hours on our morning report. On this,
10 I'm not 100 percent sure. I haven't filled it out in so
11 long that I'd be telling you something that I can't --

12 Q. You don't know --

13 A. No.

14 Q. -- how long the compressor has to be down before
15 it is reflected on Exhibit 5?

16 A. I didn't say that. What I'm saying is you said
17 30 minutes or whatever.

18 Q. Okay.

19 A. I don't --

20 Q. Since --

21 A. -- know if you can report it in -- in 30 minutes.
22 It may be in hours.

23 Q. Okay.

24 A. You know what I'm saying?

25 Q. Since you corrected me, tell me how long the

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1 compressor needs to be down before it needs to be
2 reflected on this form.

3 A. If it's down any time, it goes on the -- it's --
4 it's reflected.

5 Q. Okay. If it's down for one minute, Exhibit 5
6 will reflect that, correct?

7 MS. ASHCRAFT: Objection, asked and
8 answered.

9 A. No.

10 Q. (BY MR. J. SHEPPARD) You're saying no. I'm
11 having a hard time figuring out what you're saying,
12 because I thought you just said if it's down -- I thought
13 you just said if it's down for any time, it will be
14 reflected on Exhibit 5. And then I said, okay, so if it's
15 down for one minute, it will be reflected on Exhibit 5,
16 and you said no. So help me understand.

17 A. Ask -- can you ask me the question --

18 Q. Sure.

19 A. -- one more time so I can --

20 Q. Sure.

21 A. -- hear it?

22 Q. How much time does a compressor have to be down
23 before it is reflected on this form, Exhibit 5 to your
24 deposition?

25 A. One hour.

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1 Q. If it's less than one hour, does the downtime
2 need to be reflected on Exhibit 5?

3 A. It's -- no.

4 Q. Okay. You said that in your morning report, all
5 downtimes will be reflected; is that true?

6 A. No, it's one hour -- it's actually 30 minutes on
7 the morning report, because you can go in 23.5. This one,
8 I'm not sure about the --

9 Q. Okay.

10 A. -- the points. I know one hour is whenever
11 everything is reported.

12 Q. On the morning report, you're saying it goes in
13 half-hour increments?

14 A. It can.

15 Q. It can?

16 A. Yes.

17 Q. But someone actually goes into that morning
18 report and types how long it was up or down --

19 A. Yes, sir.

20 Q. -- for, correct?

21 A. Yes, sir.

22 Q. It's not reading that information from a
23 computer?

24 A. No, sir.

25 Q. So it's a person makes a decision to reflect

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1 downtime based on the half-hour increments?

2 A. Yes, sir.

3 Q. All right. How long after a compressor goes down
4 can it be brought back up?

5 A. Depends on what it went down on.

6 Q. Okay. What about after an ESD?

7 A. It would take a little while, about -- about an
8 hour downtime.

9 Q. More than an hour or less than an hour?

10 A. An hour.

11 MR. MARLATT: Objection, asked and answered.

12 Q. (BY MR. J. SHEPPARD) One hour?

13 A. One hour.

14 Q. Okay. What's the shortest amount of time a
15 compressor can be down and brought back up?

16 MR. MARLATT: Objection --

17 A. I have --

18 MR. MARLATT: -- confusing.

19 A. -- no idea. I really don't.

20 Q. (BY MR. J. SHEPPARD) Has it ever happened in
21 five minutes?

22 A. It depends on how -- what it -- what it goes down
23 on is -- is what I'm referring to.

24 Q. And I'm giving you full flexibility for any
25 reason. What's the quickest you've ever seen a compressor

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1 brought back up after it's gone down?

2 A. 15 minutes.

3 Q. That's the quickest you remember --

4 A. Yes, sir.

5 Q. -- seeing it? Okay.

6 Are there any records kept as to when alarms
7 are sounded at the platform?

8 A. What -- can you rephrase that? Are you talking
9 about production alarms or are you talking about emergency
10 alarms, abandon platform alarms, or --

11 Q. Are there any records kept for any alarms?

12 A. No.

13 Q. All right. Because you -- you asked me to
14 clarify as if I thought you were going to say the answer
15 matters.

16 A. I was just wanting to hear it again.

17 THE REPORTER: What?

18 A. I was wanting to hear -- I was -- I was trying to
19 think about it when I was answering it --

20 Q. (BY MR. J. SHEPPARD) Okay.

21 A. -- okay, I mean.

22 Q. But it doesn't matter, there are no records --

23 A. There is no --

24 Q. -- kept for anything?

25 THE REPORTER: Please wait.

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1 A. -- records kept for alarms.

2 Q. (BY MR. J. SHEPPARD) Let's be clear. It doesn't
3 matter what type of alarm there is, there are no records
4 kept of that alarm?

5 A. No, sir.

6 Q. Where does Fieldwood use oil pads?

7 A. They use them in the different location,
8 compressor building, generator buildings, pipeline pumps,
9 just anywhere you need them.

10 Q. What is an oil pad?

11 A. An oil -- it -- it soaks up oil.

12 Q. How big is it?

13 A. It's 12-x-12, maybe.

14 Q. Inches or feet?

15 A. Inches.

16 Q. And you can set them down?

17 A. Yes, sir.

18 Q. Who orders oil pads when they're needed?

19 A. Myself or the lead operator.

20 Q. How do you order them? Who do you call or
21 e-mail?

22 A. The company that we're buying them from.

23 Q. What company do you buy them from?

24 A. National Oilwell, Diamond -- or it was Diamond.

25 Q. NOV?

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1 A. Yeah, NOV.

2 Q. They sell oil pads?

3 A. Uh-huh.

4 Q. And Diamond Offshore --

5 A. Yes, sir.

6 Q. -- sells oil pads?

7 A. Uh-huh.

8 Q. Do they supply other supplies and equipment to
9 the platform?

10 A. Uh-huh.

11 Q. Yes?

12 A. Yes, sir.

13 Q. Back in 2014, was that also true?

14 A. I'm sure, yes, sir.

15 Q. Who's your point of contact over at NOV and
16 Diamond -- and/or Diamond?

17 A. His -- his name's Eddie's all I know, Eddie.

18 Q. What's his job; procurement, supply?

19 A. I guess you call it a salesman.

20 Q. Okay.

21 MR. J. SHEPPARD: Let's take five.

22 THE VIDEOGRAPHER: Going off the record at
23 2:35.

24 (Short recess.)

25 THE VIDEOGRAPHER: Going on record, 2:43.

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1 Q. (BY MR. J. SHEPPARD) Mr. Hadley, in addition to
2 the report, Exhibit 5 to your deposition, and the morning
3 report you referenced, are there any other records kept
4 that reflect when there have been downtimes?

5 A. No, sir.

6 Q. Okay. Who puts in the numbers that make their
7 way into Exhibit 5?

8 A. One of the operators or the mechanic, whichever
9 one's there.

10 Q. Because the information in Exhibit 5 is not
11 pulled automatically by computer, correct?

12 A. No, sir.

13 Q. A human has to go get it and put it in?

14 A. Yes, sir.

15 Q. Where is that information inputted in the
16 platform, in the office?

17 A. Yes, sir.

18 Q. Who has access to that office?

19 A. The operators, mechanic -- everybody on the
20 platform has access to it.

21 Q. Do you have access to the office?

22 A. Yes, sir.

23 Q. What computer do they use?

24 A. The operator's computer what they call it.

25 Q. Do you also use that computer?

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1 A. No, sir. I have my own computer.

2 Q. What program do they go into to put in this
3 information?

4 A. I couldn't tell you what it's called. It's been
5 so long since I even accessed it.

6 Q. That was going to be my next question. You can
7 access that program, correct?

8 A. Yeah, I probably could if I -- yes.

9 Q. All right. And it looks like a lot of input.
10 How many hours a day does the operator or mechanic spend
11 putting this information in the computer?

12 A. Maybe an hour.

13 Q. Are the numbers in these reports accurate, as far
14 as you know?

15 A. As far as I know.

16 Q. I guess with the exception of downtime, for
17 example, if you were down for 45 minutes, this form
18 wouldn't reflect that, correct, because you have to be an
19 hour before it gets reflected?

20 MR. MARLATT: Objection, asked and answered.

21 A. Your run time would be off, yeah.

22 Q. (BY MR. J. SHEPPARD) Okay.

23 A. But . . .

24 Q. Have you ever been convicted of a felony?

25 A. No, sir.

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1 Q. Have you ever been convicted of a crime of moral
2 turpitude?

3 A. What?

4 Q. Have you ever been -- have you ever been
5 convicted of a crime?

6 A. No.

7 Q. Okay.

8 MR. J. SHEPPARD: Pass the witness.

9 MR. BROUSSARD: I have just a very brief
10 question for you, sir.

11 EXAMINATION

12 BY MR. BROUSSARD:

13 Q. A lot of questions were asked during your
14 deposition -- my name's Hal Broussard. I represent Island
15 Operating Company -- about alarms and ESDs.

16 A. Yes, sir.

17 Q. I want to talk about ESDs.

18 A. Yes, sir.

19 Q. An ESD test such as you were referring to is a
20 test that is designed to make the platform shut in?

21 A. Yes, sir.

22 Q. You want to shut everything down on that
23 platform. That's your goal. That's -- that's when you --
24 when you push the ESD, that's what you want to do, you
25 want to --

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1 A. Yes, sir.

2 Q. -- shut everything down, correct?

3 A. Yes, sir.

4 Q. There is no piece of equipment when you push the
5 ESD that somebody has to go to to try to stop it from
6 shutting down?

7 A. No, sir.

8 Q. Exactly the opposite, you want everything to shut
9 down?

10 A. Exactly, yes, sir.

11 Q. There's no confusion in anybody's mind out there
12 that when you're responding to an alarm, you're doing
13 something different than when you're monitoring something
14 while an ESD test is being done. Is that --

15 MR. J. SHEPPARD: Objection --

16 Q. (BY MR. BROUSSARD) -- pretty clear to you?

17 A. Correct.

18 MR. J. SHEPPARD: Objection, leading.

19 Q. (BY MR. BROUSSARD) That's all I have. Thank
20 you.

21 MS. ASHCRAFT: No questions. Thank you very
22 much.

23 MR. MARLATT: Reserve.

24 THE VIDEOGRAPHER: Going off record, ending
25 deposition 2:48.

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(Proceedings adjourned at 2:48 p.m.)

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REPORTER'S CERTIFICATION
DEPOSITION OF JAMES HADLEY
TAKEN JULY 13, 2017

I, Rene White Moarefi, Certified Shorthand
Reporter and Notary Public in and for the State of Texas,
hereby certify to the following:

That the witness, JAMES HADLEY, was duly sworn
by the officer and that the transcript of the oral
deposition is a true record of the testimony given by the
witness;

That the original deposition was delivered to
JOHN D. SHEPPARD, ESQ.;

That a copy of this certificate was served on
all parties and/or the witness shown herein on
_____.

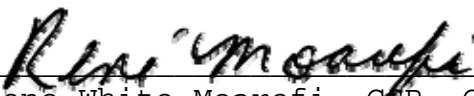

I further certify that pursuant to FRCP No.
30(f)(i) that the signature of the deponent was not
requested by the deponent or a party before the completion
of the deposition.

I further certify that I am neither counsel for,
related to, nor employed by any of the parties in the
action in which this proceeding was taken, and further
that I am not financially or otherwise interested in the
outcome of the action.

James Hadley
July 13, 2017

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1 Certified to by me this 25th day of July, 2017.

2
3
4 
5 Rene White Moarefi, CSR, CRR, RE
6 My notary commission expires 10-28-18 

7 SLS Litigation Services, LLC
8 Firm Registration No. 761
9 4008 Louetta Road, Suite 233
10 Spring, Texas 77388
11 832.998.0015
12
13
14
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16
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18
19
20
21
22
23
24
25

SLS Litigation Services, LLC
832.998.0015